

**CITY OF GARDEN GROVE**

**SB 1383 Supplemental Attachment**

**14 CCR Section 18984.1 - 14 CCR Section 18984.3 Organic Waste Collection Services**

#1: The District has not implemented compliant organic waste collection services for all residents.

Note: The District's franchised hauler provides trash, recycling, and/or green waste containers to residents of the District. A residential food waste recycling program is currently not available to any residents in the District.

<b>Action:</b>	<b>Proposed Schedule:</b>
Task 1: Conclude on-going negotiations with franchise haulers (began negotiations in 2021)	Anticipated completion date: 1/1/2023 (please note that success of negotiations may be outside of the City's control)
Task 2: Complete revisions to the franchise agreement for collection and processing	Start January 2023 - complete April 2023 (4 months pending completion of Task 1)
Task 3: Seek Board Approval of franchise agreement	Anticipated completion date: 7/1/2023 agreement effective date (dependent upon completion of Task 2)
Task 4: Outreach/Education of new/expanded services to residents	Start December 2022 - complete October 2023 (dependent upon completion of Task 3)
Task 5: Implement compliant collection system(s)	Date to be completed: 1/1/2024

**Explanation:**

Until negotiations conclude and the franchise agreement is finalized and adopted by the Board of Directors, the District is unable to provide the compliant organic waste collection services that meet the requirements of Section 18984.1 - 18984.3 to all residents. Please note, these dates are contingent upon negotiation outcomes. The Garden Grove Sanitary District's existing Franchise Agreement expires in June 2024. If negotiations with existing hauler break down or are unbeneficial to the District, the District will consider moving forward by issuing a formal Request for Proposals with new haulers. This action may delay SB 1383 implementation even further.

#2: The District has not implemented compliant organic waste collection services for all commercial businesses.

Note: The District's franchise hauler offers varying levels of trash, recycling, green waste, and food waste collection services to some businesses in the District. Mandatory collection of all waste streams is required by the District's Code of Regulations that adopted the SB 1383 requirements and became effective on December 14, 2021.

<b>Action:</b>	<b>Proposed Schedule:</b>
Task 1: Conclude on-going negotiations with franchise haulers (began negotiations in 2021)	Anticipated completion date: 1/1/2023 (please note that success of negotiations may be outside of the City's control)
Task 2: Complete revisions to the franchise agreement for collection and processing	Start January 2023 - complete April 2023 (4 months pending completion of Task 1)
Task 3: Seek District approval of franchise agreement	Anticipated completion date: 7/1/2023 agreement effective date (dependent upon completion of Task 2)
Task 4: Establish commercial accounts list	Start December 2022 - complete June 2023
Task 5: Outreach/Education of new/expanded services to businesses	Start December 2022 - complete October 2023 (dependent upon completion of Task 3)
Task 6: Implement compliant collection system(s)	Date to be completed: 1/1/2024

**Explanation:**

Per #1, until negotiations conclude and the franchise agreement is finalized and adopted by the District, the District is unable to provide a full menu of compliant organic waste collection services that meet the requirements of Section 18984.1 - 18984.3 to all of the District's commercial businesses. The timeline provided for the negotiations with the franchise hauler is a best estimate for completion of the entire process. Final program roll-out and container delivery for all commercial businesses will be significantly onerous on the District and franchise hauler due to limited container supply.

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14 CCR Section 18984.4 - Recordkeeping Requirements for Compliance with Organic Waste Collection Services	
<p>#3: The District has not yet implemented recordkeeping requirements for compliance with organic waste collection services as the District is still negotiating compliant collection methods. SB 1383-compliant reporting standards will be included as a requirement in the restated franchise agreement.</p>	
<b>Action:</b>	<b>Proposed Schedule:</b>
Task 1: Conclude on-going negotiations with franchise haulers (began negotiations in 2021)	Anticipated completion date: 1/1/2023 (please note that success of negotiations may be outside of the City's control)
Task 2: Complete revisions to the franchise agreement for collection and processing	Start January 2023 - complete April 2023 (4 months pending completion of Task 1)
Task 3: Seek District approval of franchise agreement	Anticipated completion date: 7/1/2023 agreement effective date (dependent upon completion of Task 2)
Task 4: Include prescribed recordkeeping requirements in Implementation Record	Date to be completed: 7/1/2023 (dependent upon completion of Task 3)
<b>Explanation:</b>	
<p>Per #1, until negotiations conclude and franchise agreement is finalized and adopted by the District, the District is unable to include all of the information in its Implementation Record as required by Section 18984.4 as it pertains to compliance with the organic waste collection service requirements as the franchise hauler is not contractually obligated to provide this information at this time. The timeline provided for the negotiations with the franchise hauler is a best estimate for completion of the entire process.</p>	
14 CCR Section 18984.5 - Container Contamination Minimization	
<p>#4: The District has not yet implemented the monitoring of contaminants being placed in a collection container by a generator through route reviews and/or waste evaluations as the District will be delegating this requirement to the franchise hauler through the restated franchise agreement.</p>	
<b>Action:</b>	<b>Proposed Schedule:</b>
Task 1: Conclude on-going negotiations with franchise haulers (began negotiations in 2021)	Anticipated completion date: 1/1/2023 (please note that success of negotiations may be outside of the City's control)
Task 2: Complete revisions to the franchise agreement for collection and processing	Start January 2023 - complete April 2023 (4 months pending completion of Task 1)
Task 3: Seek District approval of franchise agreement	Anticipated completion date: 7/1/2023 agreement effective date (dependent upon completion of Task 2)
Task 4: Include prescribed recordkeeping requirements in Implementation Record	Date to be completed: 7/1/2023 (dependent upon completion of Task 3)
Task 5: Outreach/Education of new/expanded services to generators	Start December 2022 - complete October 2023 (dependent upon completion of Task 4)
Task 6: Franchisee implementation of container contamination minimization programs	Date to be implemented: 7/1/2023
<b>Explanation:</b>	
<p>Per #1, until negotiations conclude and franchise agreement is finalized and adopted by the District, the District is unable to implement the container contamination minimization/monitoring requirements. The timeline provided for the negotiations with the franchise hauler is a best estimate for completion of the entire process. The franchise agreement will specify the container contamination minimization/monitoring method used for the District. The pending franchise agreement will include contamination minimization/monitoring methods compliant with Section 18984.5.</p>	
14 CCR Section 18984.6 - Recordkeeping Requirements for Container Contamination Minimization	
<p>#5: The District has not yet implemented recordkeeping requirements for the monitoring of contaminants being placed in a collection container by a generator as the District has not yet implemented container contamination minimization programs, as described in #1.</p>	
<b>Action:</b>	<b>Proposed Schedule:</b>
Task 1: Conclude on-going negotiations with franchise haulers (began negotiations in 2021)	Anticipated completion date: 1/1/2023 (please note that success of negotiations may be outside of the City's control)
Task 2: Complete revisions to the franchise agreement for collection and processing	Start January 2023 - complete April 2023 (4 months pending completion of Task 1)
Task 3: Seek District approval of franchise agreement	Anticipated completion date: 7/1/2023 agreement effective date (dependent upon completion of Task 2)
Task 4: Outreach/Education of new/expanded services to generators	Start December 2022 - complete October 2023 (dependent upon completion of Task 3)
Task 5: Hauler implementation of container contamination minimization programs	Date to be implemented: 7/1/2023
Task 6: Include prescribed recordkeeping requirements in Implementation Record	Date to be completed: 1/1/2024
<b>Explanation:</b>	
<p>Recordkeeping information regarding the hauler container contamination minimization programs will be included in the Implementation Record after program implementation. The timeline provided for the negotiations with the franchise hauler is a best estimate for completion of the entire process.</p>	

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14 CCR Section 18984.8 - Container Labeling Requirements	
<p>#6: The District's franchise hauler is currently required to place labels on each container or lid provided to generators specifying materials allowed to be placed in each container however, the current labeling requirements do not meet the requirements of Section 18984.8 without the pictures and does not specify the prohibited container materials.</p>	
<b>Action:</b>	<b>Proposed Schedule:</b>
Task 1: Conclude on-going negotiations with franchise haulers (began negotiations in 2021)	Anticipated completion date: 1/1/2023 (please note that success of negotiations may be outside of the City's control)
Task 2: Complete revisions to the franchise agreement for collection and processing	Start January 2023 - complete April 2023 (4 months pending completion of Task 1)
Task 3: Seek District approval of franchise agreement	Anticipated completion date: 7/1/2023 agreement effective date (dependent upon completion of Task 2)
Task 4: Outreach/Education of new/expanded services to generators	Start December 2022 - complete October 2023 (dependent upon completion of Task 3)
Task 5: Roll-out of new label-compliant containers by hauler to generators who are receiving new containers	Date to be completed: 1/1/2024
<b>Explanation:</b>	
<p>Per #1, until negotiations conclude and franchise agreement is finalized and adopted by the District, the District is unable to enforce the container labeling requirements. The timeline provided for the negotiations with the franchise hauler is a best estimate for completion of the entire process. The pending franchise agreement will incorporate the container labeling requirements of Section 18984.8.</p>	
14 CCR Section 18985.1 - Organic Waste Recovery Education and Outreach	
<p>#7: The District has not provided organic waste recovery education and outreach to all generators provided with organic waste collection service prior to February 1, 2022, as District will not be providing SB 1383 prescribed organic waste collection services by February 1, 2022.</p>	
<b>Action:</b>	<b>Proposed Schedule:</b>
Completed Outreach: Distribute required general education and outreach materials related to SB 1383 not specific to organic waste collection services	Complete
Task 1: Conclude on-going negotiations with franchise haulers (began negotiations in 2021)	Anticipated completion date: 1/1/2023 (please note that success of negotiations may be outside of the City's control)
Task 2: Complete revisions to the franchise agreement for collection and processing	Start January 2023 - complete April 2023 (4 months pending completion of Task 1)
Task 3: Seek District approval of franchise agreement	Anticipated completion date: 7/1/2023 agreement effective date (dependent upon completion of Task 2)
Task 4: Outreach/Education of new/expanded services to generators	Start December 2022 - complete October 2023 (dependent upon completion of Task 3)
Task 5: Rollout of education and outreach material to generators for area specific organic waste collection services	Date to be completed: 1/1/2024
<b>Explanation:</b>	
<p>Per #1, until negotiations conclude and franchise agreement is finalized and adopted by the District, the District is unable to provide the organic waste collection services prescribed by Sections 18984.1, 18984.2, or 18984.3. The District has already provided the information prescribed in Section 18985.1(a)(1)-(7) that is not specific to collection services to District generators (based on current contracting arrangements). Education and outreach is planned to be provided through both print and electronic media.</p>	

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14 CCR Section 18985.3 - Recordkeeping Requirements for a Jurisdiction's Compliance with Education and Outreach Requirements	
<p>#8: The District has not yet implemented recordkeeping requirements for organic waste recovery education and outreach as the District has not yet implemented mandatory organic waste collection services.</p>	
<b>Action:</b>	<b>Proposed Schedule:</b>
Completed Outreach: Distribute required general education and outreach materials related to SB 1383 not specific to organic waste collection services	Complete
Task 1: Conclude on-going negotiations with franchise haulers (began negotiations in 2021)	Anticipated completion date: 1/1/2023 (please note that success of negotiations may be outside of the City's control)
Task 2: Complete revisions to the franchise agreement for collection and processing	Start January 2023 - complete April 2023 (4 months pending completion of Task 1)
Task 3: Seek District approval of franchise agreement	Anticipated completion date: 7/1/2023 agreement effective date (dependent upon completion of Task 2)
Task 4: Outreach/Education of new/expanded services to generators	Start December 2022 - complete October 2023 (dependent upon completion of Task 3)
Task 5: Rollout of education and outreach material to generators for area specific organic waste collection services	Date to be completed: 1/1/2024
Task 6: Include prescribed recordkeeping requirements in Implementation Record	Date to be completed: 1/1/2024
<b>Explanation:</b>	
Information regarding the jurisdiction education and outreach efforts will be included in the Implementation Record after program implementation.	
14 CCR Section 18991.1 - Jurisdiction Edible Food Recovery Program	
<p>#9: The District has not implemented all of the edible food recovery programs required in Section 18991.1 as the District plans to use the franchised hauler to delegate aspects of these requirements. The District has completed identification of the Tier 1/2 edible food generators and has responded to the County's survey to assist with edible food capacity planning.</p>	
<b>Action:</b>	<b>Proposed Schedule:</b>
Task 1: Conclude on-going negotiations with franchise haulers (began negotiations in 2021)	Anticipated completion date: 1/1/2023 (please note that success of negotiations may be outside of the City's control)
Task 2: Complete revisions to the franchise agreement for collection and processing	Start January 2023 - complete April 2023 (4 months pending completion of Task 1)
Task 3: Seek District approval of franchise agreement	Anticipated completion date: 7/1/2023 agreement effective date (dependent upon completion of Task 2)
Task 4: Implementation of edible food recovery program	Date to be completed: 1/1/2024
<b>Explanation:</b>	
Per #1, until negotiations conclude and franchise agreement is finalized and adopted by the District, the District is unable to require the franchise hauler to subcontract the edible food recovery program to Abound Food Care for the District to comply with all of the remaining requirements in Section 18991.1. The timeline provided for the negotiations with the franchise hauler is a best estimate for completion of the entire process.	

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14 CCR Section 18991.2 - Recordkeeping Requirements for Jurisdiction Edible Food Recovery Program	
<p>#10: The District has not implemented the recordkeeping requirements for the edible food recovery programs required in Section 18991.2 as the District plans to use the franchised hauler to delegate aspects of this requirement.</p>	
<b>Action:</b>	<b>Proposed Schedule:</b>
Task 1: Conclude on-going negotiations with franchise haulers (began negotiations in 2021)	Anticipated completion date: 1/1/2023 (please note that success of negotiations may be outside of the City's control)
Task 2: Complete revisions to the franchise agreement for collection and processing	Start January 2023 - complete April 2023 (4 months pending completion of Task 1)
Task 3: Seek District approval of franchise agreement	Anticipated completion date: 7/1/2023 agreement effective date (dependent upon completion of Task 2)
Task 4: Implementation of edible food recovery program	Date to be completed: 1/1/2024
<b>Explanation:</b>	
<p>The District has completed identification of the Tier 1/2 edible food generators and has responded to the County's survey to assist with edible food capacity planning and the response will be included in the implementation record. Per #1, until negotiations conclude and franchise agreement is finalized and adopted by the District, the District is unable to require the franchise hauler to subcontract the edible food recovery program to Abound Food Care for the District to comply with all of the recordkeeping requirements in Section 18991.2.</p>	
Regulatory Requirement: 14 CCR section 18993.1. Recovered Organic Waste Product Procurement Target	
<p>#11: Not meeting the allocated recovered organic waste product procurement target.</p>	
<b>Action:</b>	<b>Proposed Schedule:</b>
Task 1: The District will coordinate with future landscaping contractors to procure recovered organic compost and mulch for use at City facilities and green spaces.	Start 4/30/2022 (Note: this will be ongoing per SB 1383 requirements)
Task 2: The District will coordinate with its franchise waste hauler to provide recovered organic compost and/or mulch giveaway events to the community.	Start 4/30/2022 (Note: this will be ongoing per SB 1383 requirements)
Task 3: The District will also seek to procure a combination of renewable gas or electricity from biomass conversion from direct service providers.	Start 4/30/2022 (Note: this will be ongoing per SB 1383 requirements)
Task 4: The District will work to include remaining procurement tons in the negotiated agreement with the hauler per #1.	Date to be completed: 7/1/2023
<b>Explanation:</b>	
<p>The District will seek to annually procure the quantity of recovered organic waste products that meets or exceeds its current annual recovered organic waste product procurement target. The District plans to provide a combination of recovered organic compost and mulch for use at District facilities and green spaces through procurement as the District does not currently utilize the material for District green spaces, medians or District facilities. In addition, the District will coordinate with its franchise waste hauler to provide recovered organic compost and/or mulch giveaway events to the community.</p>	
Regulatory Requirement: 14 CCR section 18993.2. Recordkeeping Requirements for Recovered Organic Waste Procurement Target	
<p>#12: Not implementing recordkeeping requirements for recovered organic waste procurement target.</p>	
<b>Action:</b>	<b>Proposed Schedule:</b>
Task 1: District will begin process of keeping records of any recovered organic waste product it procures to meet recordkeeping requirements.	Start 3/1/2022 (Note: this will be ongoing per SB 1383 requirements)
Task 2: The District will work with future landscapers to obtain records of recovered organic compost and/or mulch distributed in the District	Start 3/1/2022 (Note: this will be ongoing per SB 1383 requirements)
Task 3: The District will work with any direct service providers of renewable gas or electricity from biomass conversion to obtain any relevant records.	Start 3/1/2022 (Note: this will be ongoing per SB 1383 requirements)
Task 4: The District will work with a consultant to include relevant records in its Implementation Plan and recordkeeping requirements.	Start 3/1/2022 (Note: this will be ongoing per SB 1383 requirements)
<b>Explanation:</b>	
<p>The District will include in its records the name, location, and contact information of each entity or facility from whom the recovered organic waste products were procured, and a general description of how the product was used, and if applicable, where the product was applied. Records will also include any copies of invoices or similar records evidencing all procurement.</p>	

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14 CCR Section 18995.1 - Jurisdiction Inspection Requirements	
<p>#13: District does not have a compliance review program to ensure compliance with Section 18995.1(a)(1)(A) and (B).</p>	
<b>Action:</b>	<b>Proposed Schedule:</b>
Task 1: Conclude on-going negotiations with franchise haulers (began negotiations in 2021)	Anticipated completion date: 1/1/2023 (please note that success of negotiations may be outside of the City's control)
Task 2: Complete revisions to the franchise agreement for collection and processing	Start January 2023 - complete April 2023 (4 months pending completion of Task 1)
Task 3: Seek District approval of franchise agreement	Anticipated completion date: 7/1/2023 agreement effective date (dependent upon completion of Task 2)
<b>Explanation:</b>	
<p>Per #1, until negotiations conclude and franchise agreement is finalized and adopted by the District, the District will only be able to inspect some generators or violations until the hauler provides organic waste collection services to all generators. Compliance reviews will commence upon agreement or hiring of an enforcement designee for applicable SB 1383-violations until the negotiated agreement goes into effect at which time all reviews will be provided.</p>	
14 CCR Section 18995.2 - Implementation Record and Recordkeeping Requirements	
<p>#14: The District is not currently maintaining all records required by Title 14, Division 7, Chapter 12 in an implementation record.</p>	
<b>Action:</b>	<b>Proposed Schedule:</b>
Task 1: Conclude on-going negotiations with franchise haulers (began negotiations in 2021)	Anticipated completion date: 1/1/2023 (please note that success of negotiations may be outside of the City's control)
Task 2: Complete revisions to the franchise agreement for collection and processing	Start January 2023 - complete April 2023 (4 months pending completion of Task 1)
Task 3: Seek District approval of franchise agreement	Anticipated completion date: 7/1/2023 agreement effective date (dependent upon completion of Task 2)
Task 4: Outreach/Education of new/expanded services to generators	Date to be completed: 1/1/2024
Task 5: Roll-out of containers by haulers	Date to be completed: 1/1/2024
Task 6: Begin route review and inspection programs	Date to be completed: 7/1/2023
Task 7: Include prescribed recordkeeping requirements in Implementation Record	Date to be completed: 1/1/2024
<b>Explanation:</b>	
<p>Per #1, until negotiations conclude and franchise agreement is finalized and adopted by the District, the District lacks the authority to require that franchise hauler provide all of the required reporting information. Furthermore, some of the information may not be available until program implementation is completed congruent with the timelines described in this document.</p>	