# SB 1383

## City of Burbank

# Organic Waste Recycling Plan

Organic Processing Capacity

Outreach • Educate • Monitor

AB1826 • AB1594 • AB876 • AB901

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## INTRODUCTION

The purpose of the Organic Waste Recycling Plan is to provide the City of Burbank with a comprehensive program to comply with AB 1826 (Chesbro, 2014), a bill which mandates phased-in commercial organics recycling collection to 2020. This program builds upon AB 341 (Chesbro, 2011), which required mandatory commercial recycling beginning in July 1, 2012. This program also addresses AB 876 (McCarty, 2015) by identifying 15-years of organic processing capacity to 2035, thereby ensuring diverted organic material can be recycled appropriately. Lastly, the implications of SB 1383 (Lara, 2016) is analyzed. SB 1383 is a state law requiring that 50% of all organics sent to landfill be reduced by 2020, and 75% of all organics sent to landfill be reduced by 2025. Addressing these bills in one document will provide the City of Burbank with a comprehensive Organic Waste Recycling Plan to 2030.

## ORGANIC WASTE RECYCLING PLAN AND SUPPORTING LEGISLATION

AB 1826 will phase-in commercial organic waste collection to 2020 and beyond, while AB 1594 (Williams, 2014) has phased-out green waste alternative daily cover (ADC) credits in 2020. SB 1383 requires generators with local government and the local haulers to work within a shared responsibility framework to reduce 50% of all organics to landfill by 2020 and 75% reduction of all organics to landfill by 2025 in order to mitigate methane. AB 876 requires local government to identify organic processing capacity to 2035. Statewide, there will be over 14.1 million tons of organic waste coming into the market by 2025 that will need organic waste processing capacity. In 2020, the City of Burbank needs to provide organic processing capacity for **10,526 new tons** of commercial organics and another **10,728 tons** of residential and self-haul organics, to total **21,524 tons**. Due to population growth and the increased diversion expected to reduce 75% of all organic waste landfilled by 2025, the City of Burbank's organics processing capacity will need to increase to **29,834 tons by 2025**, **30,078 tons by 2030** and **30,100 tons by 2035**. AB 901 (Gordon, 2015) requires that recycling and compost operations submit periodic tracking reports to CalRecycle which started in 2019. Each of these mandates are discussed individually below:


**AB 341 "Mandatory Commercial Recycling"** | Assembly Bill 341 was signed into law in 2011 in an effort to increase the amount of material diverted from landfills from the commercial sector. It states that businesses that generate four cubic yards or more of commercial solid waste per week shall arrange for recycling services. The same requirement is also applied to multifamily dwellings of five units or more. These multifamily homes and businesses can either self-haul the materials to an appropriate facility themselves, subscribe to an existing recycling service, or arrange for other pickup of recyclable materials.

**Requirements of Local Government:** Each jurisdiction shall implement a commercial solid waste recycling program that consists of education, outreach, and monitoring of businesses that is appropriate for that jurisdiction and is designed to divert commercial solid waste from businesses. These jurisdictions shall report the progress achieved in implementing its commercial recycling program, including education, outreach and monitoring, and if applicable, enforcement efforts and exemptions, by providing updates in its electronic annual report.

**Enforcement:** CalRecycle will review each jurisdiction's commercial recycling program that consists of education, outreach and monitoring. This will include an evaluation as part of its formal AB 939 review, conducted every two or four years of each jurisdiction's programs, which includes an annual jurisdiction site visit, review of the Electronic Annual Report, and other information a jurisdiction may deem relevant.

If the jurisdiction is found to have **not** made a good-faith effort in implementing its programs, possibly including its mandatory commercial recycling program, CalRecycle can place the jurisdiction on a compliance order as part of the AB 939 review, and if it then fails to adequately meet the conditions of the compliance order, then CalRecycle could consider a penalty hearing.


**AB 1826 "Mandatory Commercial Organics Recycling"** | In October of 2014 Governor Brown signed AB 1826 into law requiring businesses to recycle their organic waste on and after April 1, 2016, depending on the amount of waste they generate per week. This law also required that starting January 1, 2016, local jurisdictions across the State implement a commercial Organic Waste Recycling Program to divert organic waste generated by businesses. Jurisdictions must conduct outreach, education to inform businesses how to recycle organic waste in the jurisdiction, and monitoring to identify those not recycling and inform them of the law and how to recycle organic waste. This **"**Organic Waste Recycling Plan" is prepared by the City of Burbank to comply with AB 1826, AB 876, and SB 1383. The ultimate goal of the bill is to divert 50% of organics disposal from commercial businesses by 2020 as compared to 2014, estimated at 8.1 million new statewide tons of organics by 2020[1]. For the City of Burbank at least **10,526 new tons** of commercial organic waste will need to be collected from accounts that generate 4 cubic yards of MSW per week for full compliance. CalRecycle could trigger that the AB 1826 threshold be lowered to accounts that generate 2 cubic yards per week of MSW as soon as January 1, 2021.

Specific requirements for the AB 1826 Organic Waste Recycling Program must include:

- ✓ Identification of the number of regulated businesses that generate organic waste.
- ✓ Education, Outreach, and Monitoring following the AB 341 regulations.
- ✓ Existing organic waste recycling facilities within a reasonable vicinity and the capacities available for materials to be accepted at each facility.
- ✓ Existing solid waste and organic waste recycling facilities within the jurisdiction that may be suitable for potential expansion or colocation of organic waste processing or recycling facilities.
- ✓ Efforts of which the jurisdiction is aware that are underway to develop new private or public regional organic waste recycling facilities that may serve some or all of the organic waste recycling needs of the commercial waste generators within the jurisdiction subject to this chapter, and the anticipated timeframe for completion of those facilities.
- ✓ Closed or abandoned sites that might be available for new organic waste recycling facilities.
- ✓ Other non-disposal opportunities and markets.
- ✓ Appropriate zoning and permit requirements for the location of new organic waste recycling facilities.
- ✓ Incentives available, if any, for developing new organic waste recycling facilities within the jurisdiction.

AB 1826 phases in the mandatory recycling of commercial organics. The implementation schedule outlined is as follows:

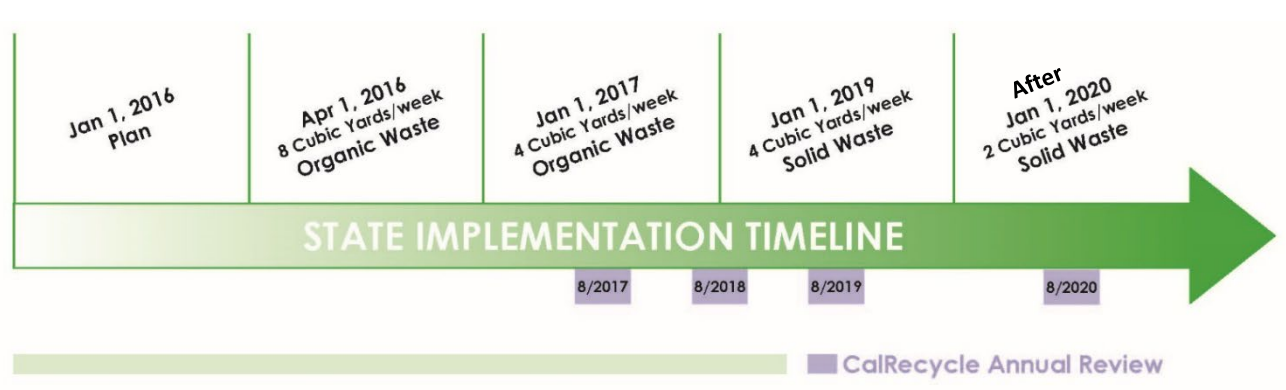
- ✓ **January 1, 2016** | On and after this date, local jurisdictions must have an Organic Waste Recycling Program in place. Jurisdictions must identify regulated businesses and conduct outreach and

[1] Note that it is unlikely that the State has met the required organic diversion. However SB 1383 takes over these diversion requirements where the State is looking forward to the next set of diversion goals.

education to inform those businesses how to recycle organic waste in the jurisdiction and monitor to identify those not recycling and inform them of the law and how to recycle organic waste.

- ✓ **April 1, 2016** | Businesses that generate 8 cubic yards of organic waste per week must arrange for organic waste recycling services.
- ✓ **January 1, 2017** | Businesses that generate 4 cubic yards of organic waste per week must arrange for organic waste recycling services.
- ✓ **August 1, 2017 and ongoing** | Jurisdictions must provide information about their Organic Waste Recycling Program implementation in the annual report submitted to CalRecycle.
- ✓ **Fall 2018** | After receipt of the 2017 annual reports submitted on August 1, 2018, CalRecycle shall conduct its formal review of those jurisdictions that are on a two-year review cycle.
- ✓ **January 1, 2019** | Businesses that generate 4 cubic yards or more of commercial solid waste per week must arrange for organic waste recycling services.
- ✓ **After 2020** | After 2020, if CalRecycle determines that the statewide disposal of organic waste has not been reduced by 50% of the level of disposal in 2014, the organic recycling requirements on businesses will expand to cover businesses that generate 2 cubic yards or more of commercial solid waste per week. Additionally, certain exemptions may no longer be available if the 2020 target is not met.
- ✓ **Fall 2020** | After receipt of the 2019 annual reports submitted on August 1, 2020, CalRecycle shall conduct its formal review of all jurisdictions. CalRecycle will continue to conduct the two- and four-year reviews after this cycle.
- ✓ **January 1, 2021** |Accounts that generate 2 cubic yards or more of commercial solid waste per week will need to be offered a program should CalRecycle trigger the lower threshold
- ✓ **January 1, 2012** | SB 1383 regulations take effect for residential and commercial accounts

**AB 1826 State Implementation Timeline**



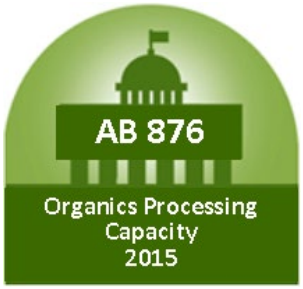


**AB 1594 "Green Waste ADC Phase-out of Diversion Credits"** | This bill was approved by the Governor on September 28, 2014, and states, commencing January 1, 2020, the use of green material as alternative daily cover (ADC) would not constitute diversion through recycling and would be considered disposal for purposes of the act. The bill commenced August 1, 2018 and requires local jurisdictions to include information in an annual report on how the local jurisdiction intends to address these diversion requirements and divert green material that is being used as ADC. The bill requires a jurisdiction that does not meet certain diversion requirements as a result of not being able to claim diversion for the

use of green material as ADC to identify and address, in an annual report, barriers to recycling green material and, if sufficient capacity at facilities that recycle green material is not expected to be operational before a certain date, to include a plan to address those barriers. The bill would impose a state-mandated local program by imposing new duties upon local agencies with regard to the diversion of solid waste.

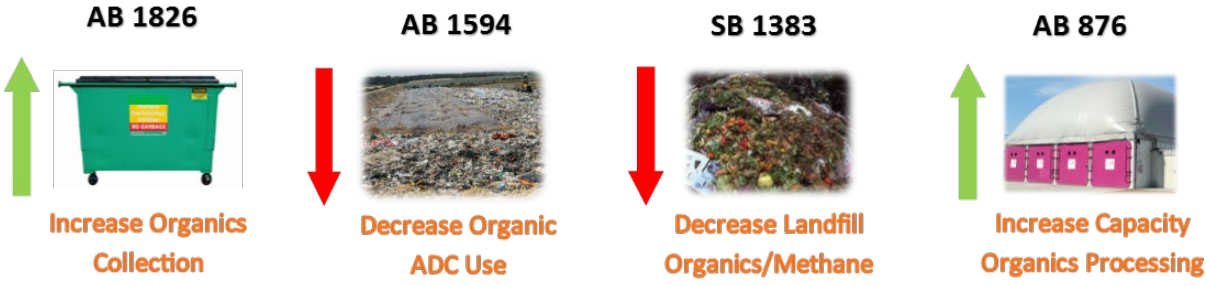
The City of Burbank does not use significant amounts of green waste as ADC as the CalRecycle disposal reporting records show that only 43 tons were used in 2018. These records are available on CalRecycle's website for 2018 for Burbank as linked below.

https://www.calrecycle.ca.gov/lgcentral/basics/adcgreen




**AB 876 "15-Year Organic Processing Capacity"** | AB 876 was passed in 2015 and compliments AB 1826 by requiring, beginning August 1, 2017, cities to include in their annual reports to CalRecycle, an estimate of the amount of organic waste that will be generated by the City over a 15-year period. In addition, it calls for an estimate of the additional organic waste capacity that will be needed to process that amount of waste, and areas identified by the city as potential locations for new or expanded organic waste recycling facilities capable of safely meeting that additional need. Capacity to 2035 will be identified.

## How Organics Legislation Works Together





**SB 1383 "Organics Reduction for Methane Mitigation"** | Senate Bill 1383 has identified the reduction of methane generation of organic waste as a prioritized climate change mitigation strategy. As such, SB 1383 mandates reductions in the landfilling of organic waste, and thereby methane emissions. Whereas AB 341 and AB 1826 placed the burden of mandatory collection on the generators with local government planning effort, SB 1383 explicitly shares the responsibility with local government where CalRecycle may add fines and penalties much like AB 939, but with enforcement starting in 2022. SB 1383 has required CalRecycle to adopt regulations that achieve the specified targets for reducing organic waste in landfills. These regulations authorize local jurisdictions to charge and collect fees to recover the local jurisdiction's costs incurred in complying with the regulations.

SB 1383 requires CalRecycle to analyze the progress that the waste sector, state government, and local governments have made in achieving the specified targets for reducing organic waste in landfills such as

infrastructure development and markets for products by July 1, 2020. SB 1383 would authorize CalRecycle, depending on the outcome of that analysis, to amend the regulations to include incentives or additional requirements. The regulations shall also include requirements intended to meet the goal that no less than 20% of edible food that is currently disposed of is recovered for human consumption by 2025.

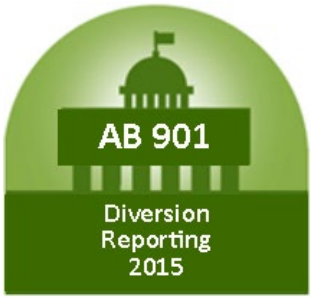
Specifically, this bill adds two goals for organic waste disposal reductions:

- ✓ A 50% reduction in the level of statewide disposal of organic waste from the 2014 level by 2020.
- ✓ A 75% reduction in the level of statewide disposal of organic waste from the 2014 level by 2025.

In 2020, the analysis will include:

- ✓ Status of new organics recycling infrastructure development, including the commitment of state funding and appropriate rate increases for solid waste and recycling services to support infrastructure expansion.
- ✓ Progress made in reducing barriers to the siting of organics recycling facilities and the timing and effectiveness of policies that will facilitate the permitting of organic's recycling infrastructure.
- ✓ Status of markets for the products generated by organics recycling facilities.

This report will identify 2020, 2025, 2030 and 2035 organics disposal targets for the City of Burbank, as well as provide a benchmark for measuring the above goals.




**AB 901 "Reporting Requirements"** | AB 901, which was passed in 2015, will require exporters, brokers, and transporters of recyclables or composters to submit periodic information to CalRecycle on the types, quantities, and destinations of materials that are disposed of, sold, or transferred inside or outside of the state, and would authorize the department to provide this information, on an aggregated basis, to jurisdictions, as specified.

The regulations started January 1, 2018. The City of Burbank will be required to track the organics tons being transferred into the marketplace on a quarterly basis and report those tons to CalRecycle. AB 1103 (Dodd, 2016) will require generators that self-haul more than one cubic yard per week of its own food waste to a location or facility not owned or operated by the entity will need to report those tons to CalRecycle, and these regulations may dovetail with AB 901.


**SB 32 "2030 GHG Reduction Goals"** | The California Global Warming Solutions Act of 2006, known as AB 32, designates the California Air Resources Board (CARB) as the state agency charged with monitoring and regulating sources of emissions of greenhouse gases. CARB is required to approve a statewide greenhouse gas emissions limit equivalent to the statewide greenhouse gas emissions level in 1990 to be achieved by 2020 and to adopt rules and regulations in an open public process to achieve the maximum, technologically feasible, and cost-effective greenhouse gas emissions reductions. California is on track to meet the AB 32 goals in 2020. SB 32 would require CARB to ensure that statewide greenhouse gas emissions are reduced to 40% below the 1990 level by 2030. CARB will be preparing the 2030 Target Scoping Plan in 2016 and 2017 that will integrate SB 1383 and the AB 32 Scoping Plan adopted in 2014 to meet the SB 32 goals. This report will identify 2020, 2025, and 2030 organics disposal targets along with the associated greenhouse gas reduction benefits for the City of Burbank.

## MANDATORY COMMERCIAL ORGANICS RECYCLING: OUTREACH AND EDUCATION

The outreach and education requirement of the Mandatory Commercial Organics Recycling Program (MCOR) will mimic the requirements of the Mandatory Commercial Recycling Rule (MCR) required in AB 341. The City of Burbank is required, in their annual reports, to provide local businesses subject to the rule with education, outreach, and monitoring of the program. Further, the program requires that businesses be notified if they are not in compliance.

The City of Burbank has a public fleet to collect residential materials and relies upon the private hauler permit system to collect commercial materials and debris boxes. The permit system allows the City to set requirements but does not provide the same levels of collection efficiencies and monitoring that a commercial franchise system allows. The City of Los Angeles embarked upon what was nearly a 10-year process to franchise their commercial sector to accommodate mandatory commercial collection and other co-benefits that the franchise systems allows. The City of Burbank will need to adjust their permit requirements to fully implement AB 1826 and the goals of SB 1383.

As part of AB 341, the City of Burbank had an active education and outreach program in 2014-2015 with the following key activity which will be utilized to design the AB 1826 program:

- Direct contact:
  - Coordination with other City departments
  - Presentations to Chamber of Commerce, business groups, and business districts
  - Quarterly visits by haulers to generators
  - Direct phone calls to business
- Electronic:
  - Updated City website about AB 341
  - Linked to the CalRecycle information website
  - Televised program on cable channel
  - Provide electronic copy of newsletter on website
  - Provide email message through Burbank Green Alliance and the Chamber of Commerce
- Print
  - AB 341 information in City newsletter twice per year in the utility bill
  - Coordination with other business licenses and inspection programs on large quantity generators
  - Haulers providing AB 341 brochures to businesses and multifamily units
  - Ad in Chamber of Commerce newsletters and directory

Monitoring the programs and the tons set forth by the commercial sector has its challenges within the current permit system. The City of Burbank has surveyed haulers that have worked with large quantities generators for AB 341 and needs to modify the permit system to fully implement AB 1826, and to accommodate the reporting requirements of both AB 901 and AB 1103. The City of Burbank therefore will provide the following:

**Outreach & Education** | Our strategic outreach plan is two-fold; to monitor existing customers and to facilitate service to new commercial organics customers (both within the threshold of compliance and beyond).

**Our goal is to provide an Outreach & Education Program that ensures each business has the information, tools, resources and support to reach their best level of diversion potential that is practical and best suits their needs.**

Some businesses, on their own with self-haul or with their hauler, may have proactively complied with AB 1826 as an early adopter as a result of utilizing best management practices or to reach their corporate sustainability goals. The City has compiled the AB 1826 Eligible Businesses List and is provided as **Appendix A.** The City has already reached out to all businesses alerting them of the law and focused on the 145 companies that may have generated more than 4 cubic yards of organics per week. The current requirement under AB 1826 is for the estimated 145 businesses that generate 4 or more yards of cubic waste each week to subscribe to an organics diversion service. Should CalRecycle reduce the threshold to 2 cubic yards of waste generation per week, an estimated total of 1,840 businesses would be covered by AB 1826.

The City will regularly promote the availability of free assistance through our website, newsletters, social media, community involvement activities, and other outreach efforts. Commercial customers that meet the threshold of AB 1826 will be contacted by the City through site visits, waste assessments, waste audits, and other technical assistance methods throughout the year.

**Initial Technical Assistance** | Our approach includes reaching out to every business, sending positive messages and facilitating participation to keep customers engaged in the program. The City will survey each of the permitted haulers to determine their organic waste collection program features, to facilitate the connection of the hauler program to the generator's organic waste, and will request the hauler to provide education materials and training on how the business can best participate in the features of the specific hauler program. Sample information that City of Burbank has already provided to the businesses relevant to AB 1826 is provided in **Appendix B.**

Additional contact with commercial customers will include a letter informing the eligible businesses of the requirements of AB 1826 along with how we can provide assistance, compliance and partner with their hauler. We will deploy other aspects of our Technical Assistance Program that includes providing and promoting the following comprehensive services:

- ✓ **Coordination with Business Owners/Managers** | We will work cooperatively with the owner, manager, or other designated representative at each business, as well as their hauler. This will ensure that program buy-in is achieved and supported at a high level and will also help us develop a consistent point of contact for future outreach efforts.
- ✓ **Initial Site Visit** | We will contact each commercial business to schedule a site visit with their hauler representative, perform a complete walk-through and identify opportunities for greater waste reduction and diversion.
- ✓ **Waste Assessments** | We will facilitate a comprehensive waste assessment with the hauler representative of the following:
  - Current service levels;
  - Recycling, organics, and garbage volumes generated;
  - Current and proposed program signage;
  - Training for managers, supervisors and line staff;
  - Review and provide opportunities for increasing diversion;
  - Interior and external container feasibility; and,
  - Final report and suggestions for improvement.

- ✓ **Distribution of Material|** We will coordinate with the hauler to provide managers with an education kit that includes a service guide, posters, brochures, and labels for containers.
- ✓ **Conduct Training/Presentations |** We will coordinate with the hauler and be prepared to offer training to maintenance staff and employees of individual businesses, homeowner associations, service organizations, and civic/community groups. The training/presentations could cover the principles of the 4Rs, the haulers collection services, along with outreach and technical assistance specific to the audience. Collaborating with community and business groups, will foster increased participation and diversion.


**Ongoing Technical Assistance** | We understand that public education, outreach, and technical assistance must be ongoing, as businesses, individuals and service requirements can change. The focus is clear communication, engagement and education, where we would work with the private hauler under the permit system to consider the following:

- ✓ **Site Visits & Audits |** Contamination audits (annual and spot checks) together with the use of Non-Collection and Corrective Action Notices and follow-up appointments will play a critical role in determining participation in diversion programs and decreasing contamination levels.
- ✓ **Proactive & Comprehensive Education, Outreach & Technical Assistance |** This plan has two parts working with the hauler: 1) transition education and outreach and 2) ongoing customer education and outreach. The outreach and education components will inform all businesses of programs, upcoming events, such as cart delivery, program start dates, special collection events and so forth. Another objective is to increase diversion over time and motivate customers to be environmentally aware. A clear and concise message repeated consistently through a number of effective outlets, produces the best results for affecting behavior change and increasing diversion.

  We also recognize that some businesses need reasons to alter behavior; to better motivate these customers; we will include interesting facts and statistics about the benefits of recycling and organics diversion along with living sustainably in our outreach materials.
- ✓ **Corrective Action Notices & Comprehensive Labels |** Corrective Action Notices by the hauler could be a basic component of outreach and may be utilized during annual waste audits to educate customers of proper participation. They are also used whenever a driver observes contaminants in containers, including the presence of recyclable and compostable materials in the garbage cart. Unpermitted / Hazardous Waste Notices are also utilized to alert the customer that unpermitted waste material was found in one of their containers and provides a list of unpermitted wastes and information about the programs available for proper disposal. Appropriate and inclusive container labels encourage good recycling behaviors and minimize contamination.

- ✓ **Community Involvement & Recognition** | A standout feature of the education program could include the following where the City of Burbank would work the permitted haulers with a common message and theme:
  - **Vehicle Billboards** | Equip the collection vehicles with frames for billboards and collaborate with the haulers to develop signage that promotes recycling and diversion programs, as well as promote a sustainable community.
  - **Participation in Special Events** | Participate in a wide variety of community and business sponsored events and take every opportunity to encourage attendees to recycle at the event as well as in their homes and businesses.
- ✓ **Recognizing Business Recycling/Composting ALL STARS** | We will recognize recycling/composting ALL STARS in the community and acknowledge them in our outreach material and via social media. We have found that businesses use this as a competitive advantage and can influence other companies to follow-suit and participate in diversion programs.
- ✓ **Monitoring, Record Keeping & Reporting** | The City will need to revise the Private Hauler Contractor and License Permit in order to obtain the required information to fully comply with the record keeping and reporting requirements specified in AB 1826.

Sample outreach flyers have been included in **Appendix B**.

## REGULATED BUSINESSES AND ORGANIC WASTE GENERATION

CalRecycle requires each jurisdiction to provide information on both the number of regulated businesses that generate organic waste and the number that are currently diverting these materials in a collection program, or other diversion program. Guidance has been provided to jurisdictions to use the North American Industrial Classification System's (NAICS) codes, and CalRecycle Waste Characterizations, to determine exactly which businesses are subject to AB 1826 on the basis of employment. The process calculates the number of regulated businesses, as well as how many pounds of organic and inorganic waste are generated per employee per week, and through conversion, how many cubic yards and tonnage of each waste type is generated per week. **Appendix A** also provides CalRecycle's calculation methodology used here to determine AB 1826 Eligible Business Generation. This Organic Waste Recycling Program also calculates the amount of eligible commercial organic waste that will be generated up to 2035, in order to identify the jurisdiction's requirements under AB 876. This generation, measured in tons, will be the required capacity for organics processing for the next 15 years.

**Eligible Businesses for MCOR** | CalRecycle is developing a tool using the North American Industrial Classification System (NAICS) that will assist in identifying businesses that meet the minimum waste generation threshold. CalRecycle will be using data from the 2014 Waste Characterization Study and other data sources to help determine the potential businesses in the jurisdiction that generate an amount of organic waste that requires them to subscribe to organic recycling services. This tool will provide the number of employees in each business group that would potentially generate a given threshold amount. Commercial organic waste includes food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste. Table 1 below provides the number of businesses at each eligibility phase of AB 1826. Per the requirements 145 businesses should have had Organics Collection Programs in 2017, which ramped up to 1,840 businesses in 2020. Table 1 below provides the types and number of businesses that would be included in the program from beginning in 2017 up to 2020.

**Table 1. Eligible Businesses for the City of Burbank as determined by NAICS Codes**

| Burbank: AB 1826 - Eligible Businesses | | | |
|---|---|---|---|
| | **2017: 4 CY Organics per Week** | **2019: 4 CY MSW per Week** | **2020: 2 CY MSW per Week** |
| Arts and Education | 17 | 55 | 103 |
| Durable Wholesale/Trucking | 4 | 11 | 28 |
| Education | 0 | 34 | 34 |
| Hotels | 2 | 11 | 18 |
| Electronic Equipment | 1 | 2 | 2 |
| Food and NonDurable Wholesale | 4 | 11 | 21 |
| Manufacturing | 1 | 20 | 20 |
| Medical and Health | 1 | 14 | 37 |
| Public Administration | 0 | 5 | 9 |
| Restaurant | 7 | 157 | 326 |
| Food Stores | 34 | 95 | 177 |
| Retail Trade | 14 | 115 | 237 |
| Svcs Mgmt Admin | 20 | 20 | 61 |
| Svcs Professional | 28 | 283 | 646 |
| Svcs Repair and Personal | 1 | 19 | 68 |
| Other | 11 | 29 | 53 |
| **TOTAL ELIGIBLE:** | **145** | **881** | **1,840** |

*Transition year threshold is the average of 2017 and 2019's minimum employees. This figure models the number of businesses in 2018 starting programs in advance the 4 cubic per week MSW threshold of 2019.

Table 2 below translates the eligible businesses in terms of cubic yards, to tons, using standard CalRecycle formulas. Note that the tons in Table 2 is an estimate of organic waste *generation*, and not the amount that is actually being disposed of in the landfill. Many larger generators may already have internal self-haul programs where the commercial organics are already being diverted, but not accounted for in the franchise system.

**Table 2 – Estimated Generation from Eligible Businesses for the City of Burbank**

| Burbank: AB 1826 - Eligible Generation by Business Type (tons/year) | | | |
|---|---|---|---|
| | **2017: 4 CY Organics per Week** | **2019: 4 CY MSW per Week** | **2020: 2 CY MSW per Week** |
| Arts and Education | 3,881 | 5,061 | 5,550 |
| Durable Wholesale/Trucking | 182 | 318 | 471 |
| Education | 0 | 941 | 941 |
| Hotels | 485 | 865 | 955 |
| Electronic Equipment | 106 | 117 | 117 |
| Food and NonDurable Wholesale | 358 | 574 | 705 |
| Manufacturing | 128 | 540 | 540 |
| Medical and Health | 202 | 544 | 759 |
| Public Administration | 0 | 203 | 244 |
| Restaurant | 1,962 | 8,959 | 10,859 |
| Food Stores | 2,545 | 3,942 | 4,731 |
| Retail Trade | 2,549 | 4,865 | 5,580 |
| Svcs Mgmt Admin | 1,270 | 1,270 | 1,833 |
| Svcs Professional | 6,251 | 11,630 | 13,518 |
| Svcs Repair and Personal | 98 | 366 | 553 |
| Other | 507 | 801 | 982 |
| **TOTAL TONS:** | **20,524** | **40,996** | **48,337** |

*Transition year threshold is the average of 2017 and 2019's minimum employees. This figure models the number of businesses in 2018 starting programs in advance the 4 cubic per week MSW threshold of 2019.

**Disposal Based Organics Diversion Calculations** | Total eligible tons required for diversion can be calculated another way based on current disposal at a landfill. This secondary means of estimation allows for comparison to eligible businesses following the CalRecycle AB 1826 model. The CalRecycle Waste Characterization Studies of 2008 and 2014 were used to determine the total amount of commercial organic waste and material types that was disposed of in landfills. The year 2014 is used as a baseline per AB 1826, which requires a 50% reduction of commercial organics disposal from 2014 levels by 2020. The City of Burbank disposed of 77,558 tons in 2014 as listed on the CalRecycle Home Page and copied below.

The 2014 Waste Characterization estimates 50% of the overall waste stream is commercial, and the 2014 Waste Characterization estimates that 43% of that waste is organic. Of this, 18% is food waste, 7% is yard waste, 14% is wood waste, and 4% is compostable paper. These same percentages are applied to the City of Burbank's disposal amount, to determine the quantity of organics covered by AB 1826.

## Jurisdiction Diversion/Disposal Rate Detail

| | | | |
|---|---|---|---|
| **Jurisdiction:** | Burbank | **Reporting Year:** | 2014 |
| **County:** | Los Angeles | | |
| **Reporting-Year Disposal Amount (tons):** | | | 77,558.46 |

**AB 1826 New Tons** | By this estimate, reaching this goal requires **at least 10,526 tons** of new organics diversion as generation is expected to grow as the population of Burbank expands.

**Comparison of Results** | The generator-based NAICS model estimates that AB 1826-eligible Burbank businesses will *generate* **48,337 tons** of organic waste in 2020. Whereas the disposal-based estimate suggests that only **16,580 tons** were actually disposed of in 2014. The differences arising between these two models are attributable to waste stream differences between the statewide characterizations and the specific waste stream of the City. The City of Burbank is commercially intensive, suggesting commercial waste generation comprises a greater portion of the waste stream statewide disposal-based model predicts, and that there are existing organic waste programs already in place. The City of Burbank's employment of 143,464 people versus its resident population of only 105,543 supports this claim.

As such, the disposal-based target of 10,526 tons is a low-end estimation and should be considered a minimum of new tons for diversion. A graph providing both the generated tons, represented by the blue line, and disposal-based new tons is provided on the next page.

**Other Diversion** | Of the eligible commercially generated tons, it is likely that many large generators are already diverting their food waste through a variety of programs. These programs include back-hauling

## DISPOSAL BASED DETERMINATION OF BURBANK'S AB 1826 TARGET

| | |
|---|---|
| Total Waste Disposed in 2014 (CalRecycle data): | **77,558 tons** |
| Total Commercial Waste Disposed in 2014 (49.52% of waste): | **38,410 tons** |
| Commercial Organic Waste Disposed in 2014 (43.16% of commercial): | **16,580 tons** |
| AB 1826 Target: 50% of the level disposed of during 2014: | **8,290 tons** |
| New Tons Needed to Reach Target with Population Growth: | **10,526 tons** |

organics materials to large distribution centers where they are consolidated and transported to a compost (or other) facility, which has been typically seen in large grocery store chains. In addition, non-franchise collection of organics often occurs by livestock owners who collect food waste materials to feed animals such as cattle and hogs. AB 1103 requires generators that self-haul more than one cubic yard per week to report those tons to the State as of 2018. Also, edible food is often rescued by organizations who distribute these products to homeless and deserving families. These programs contribute to the diversion of organics from landfill but have been notoriously difficult to track and manage. It is possible that these programs are diverting additional organics tons, but they are currently untracked. AB 1383 regulations will include requirements intended to meet the goal that not less than 20% of edible food that is currently disposed of is recovered for human consumption by 2025.

**Diversion Achieved by 2018** | In 2018, there is data available for both the amount of waste Burbank sent to landfills[2] and the estimated composition of these tons[3]. Burbank's progress towards the statewide

[2] https://www2.calrecycle.ca.gov/LGCentral/DisposalReporting/Destination/DisposalByFacility
[3] https://www2.calrecycle.ca.gov/Publications/Details/1666

goals can be measured this information. Table 1 below describes 2018's commercial disposal as it pertains to the reduction target.

Column one indicates the material type. Column two shows how much organics disposal has increased (+) or decreased (-) from 2014 to 2018, in tons. Column three shows how many new tons are expected to be diverted to keep pace with statewide targets. Columns four and five demonstrate how much of the target goal has been achieved and how many new tons still need to be diverted.

**Table 3 – Progress on AB 1826**

| Estimated Commercial Organics Disposal based on 2018 Statewide Characterization | | | |
|---|---|---|---|
| **Material** | **Disposal Change from 2014 (tons)** | **2020 Target (new tons)** | **Remaining New Tons to Divert** |
| **Food** | 360 | 4,781 | 5,141 |
| **Green** | -879 | 1,597 | 717 |
| **Wood** | -1,839 | 3,056 | 1,217 |
| **Paper** | 845 | 1,092 | 1,937 |
| **Manure** | -105 | | -105 |
| **Net** | **-1,618** | **10,526** | **8,908** |

| **Net Percent Achieved toward 50% Commercial 2020 Diversion Goal: 15.40%** |
|---|

Burbank has made some progress in reducing the amount of organic waste in the residential and self-haul sectors too. The reduction of this waste, in addition to the amounts reduced in the commercial sector are reflected in the reduction summary in Table 4 and Table 5.

**Table 4 – Progress on SB 1383 (2020) Target**

| Total (SB 1383) - 2020 - 50% reduction target (tons per year) | | | |
|---|---|---|---|
| **Material** | **Disposal Change from 2014 (Tons)** | **2020 Target (New Tons)** | **Remaining New Tons to Divert** |
| **Food** | -3,339 | 10,676 | 7,337 |
| **Green** | -809 | 3,457 | 2,649 |
| **Wood** | -362 | 4,600 | 4,238 |
| **Paper** | 553 | 2,481 | 3,033 |
| **Manure** | 28 | 39 | 67 |
| **Net** | **-3,930** | **21,254** | **17,324** |

**Net Percent Achieved toward 50% Overall 2020 Diversion Goal: 18.50%**

**Table 5 – Progress on SB 1383 (2025) Target**

| Total (SB 1383) - 2025 - 75% reduction target (tons per year) | | | |
|---|---|---|---|
| **Material** | **Disposal Change from 2014 (Tons)** | **Target 2025** | **Remaining New Tons to Divert** |
| **Food** | -3,339 | 14,986 | 11,647 |
| **Green** | -809 | 4,853 | 4,044 |
| **Wood** | -362 | 6,457 | 6,095 |
| **Paper** | 553 | 3,483 | 4,035 |
| **Manure** | 28 | 55 | 83 |
| **Net** | **-3,930** | **29,834** | **25,905** |

**Net Percent Achieved toward 75% Overall 2025 Diversion Goal: 13.20%**

## ORGANIC WASTE PROCESSING CAPACITY

This Organic Waste Recycling Plan helps to address the requirements under AB 876, which requires jurisdictions to provide an estimate of the amount of organic waste they generate and identify processing capacity for that organic waste for the next 15-years to 2035. AB 876 requires the City to identify potential locations for new or expanded organic waste recycling facilities capable of safely meeting that additional need. The City of Burbank, due to its urban location within Los Angeles County, experiences both high levels of organic waste generation and limited existing capacity to process such materials. As such, the City will need to pursue innovative and creative strategies for its waste as more organic material is diverted from landfills.

Using the disposal based model with 2014 as the baseline, the City of Burbank will need to provide organic processing capacity for a minimum of **10,526 tons** of commercial organics by 2020 and another **10,728 tons** of residential and self-haul organics by 2020, to total **21,254 tons** by 2020, as shown in Table 6 below. Due to population growth and the reduction of 75% of all organic waste landfilled in 2014 by 2025, the organics processing capacity of the City of Burbank will need to increase to **29,834 tons by 2025** and **30,078 tons by 2030**, and **30,100 tons by 2035**. A calculation of these figures is included in **Appendix C.**

**Table 6. Disposal Based Calculation Organic Diversion Tonnages – City of Burbank**

| Overview: New Tons for Organics Diversion | | | | |
|---|---|---|---|---|
| | **2020** | **2025** | **2030** | **2035** |
| AB 1826 - Commercial Organics | 10,526 | 14,775 | 14,896 | 14,907 |
| SB 1383 - Residential and Self-Haul Organics | 10,728 | 15,059 | 15,182 | 15,193 |
| **Total New Tons** | **21,254** | **29,834** | **30,078** | **30,100** |

*Other compostable material (<1%) is included under Food Waste.

**Existing organic waste recycling facilities within a reasonable vicinity and the capacities available for materials to be accepted at each facility.**

**Green Waste Composting** | The City of Burbank currently collects between 15,000 to 18,000 tons per year of residential green waste and transfers the material from Burbank Landfill No. 3 to permitted composting facilities throughout the southern state, and is currently being hauled to the Blossom Hill Compost facility neat Lamont in Kern County. The City of Burbank has been hauling up to 100 tons per day from their operations permitted under an Enforcement Agency Notification Tier and is not permitted to accept food waste. A copy of the EA Notification Tier is provided in **Appendix D**. Commercial green waste is collected by private haulers and landscapers and is hauled to private sector material recovery facilities and transfer stations in the immediate area where the material is processed and hauled away to one of the many markets: regional compost facilities, land application or possibly used as alternative daily cover. AB 901 regulations began tracking these tons starting in 2019. With the implementation of this AB 1826 program, the private haulers and larger landscapers will be surveyed to baseline current practices and inform them of the AB 1826 program and the AB 901 regulations.

**Food Waste and Green Waste Composting** | Commercial food waste is currently collected by a few private haulers from large quantity generators or is being self-hauled by the generators. The food waste may be hauled to the private sector material recovery facilities and transfer stations in the immediate area where

the food material is processed and hauled to a regional food waste composting site. AB 901 regulations are tracking those tons starting in 2019. With the implementation of this AB 1826 program, the private haulers and larger generators will be surveyed to baseline current practices and inform them of the AB 1826 program and pending AB 901 and AB 1103 regulations. The City of Burbank does not have a residential food waste collection program at this time. Compostable paper may be collected with food waste at zero waste events and is untracked at this time.

**Wood Waste** | Wood waste is currently collected by a few private debris box haulers or is being self-hauled by the generators. The wood waste may be hauled to private sector material recovery facilities and transfer stations in the immediate area where the wood waste is processed into wood chips that could be used for mulch or bioenergy. AB 901 and/or AB 1103 regulations are tracking those tons as of 2019. With the implementation of this AB 1826 program, the private C&D haulers should be surveyed to baseline current practices and inform them of the AB 1826 program and AB 901 regulations.

**Identify existing solid waste and organic waste recycling facilities within the jurisdiction that may be suitable for potential expansion or co-location of organic waste processing or recycling facilities.**

**Existing Facilities - City of Burbank Landfill No. 3** | The City of Burbank has been operating a Green Waste Transfer Operation at Burbank Landfill No. 3 at 3000 Bel Aire Drive, Burbank, California, and is regulated as an Enforcement Agency Notification operation with SWIS No. 17-AA-1072, separately from the landfill operations. The facility operates five days per week and only receives green waste collected by the city residential fleet. The private commercial fleet does not utilize the facility for green waste transfer. The material arriving at the facility is deposited on an all-weather pad dedicated to the green waste operation. Incoming feedstock is source-separated at the point of generation. Material removal from the facility is conducted with front end loaders and transfer trailers. When transfer trailers arrive at the site, they are directed toward the loading area. This loading area consists of a six-foot-high by 70-foot long retaining wall. The transfer trucks park on the downhill side of the wall, subsequently a front end loader picks up the piled material and loads the trucks from on top of the retaining wall. The transfer trucks are filled, weighed, and tarped before being allowed to leave the site and green waste is currently being hauled to the permitted Harvest Compost Facility in Tulare County.

As an option, the operation may be re-permitted this year as a 'green material composting operation' with a new Enforcement Agency (EA) Notification operation and new SWIS number, separately from the landfill operation. Food waste would not be allowed under this type of permit. The name of the operation will remain the same and the green waste transfer operation will remain the new EA Notification operation, but will allow occasional composting by default due to seasonal high temperatures above 121 Fahrenheit and will also allow the ability to receive incidental manure from residential sources.

**Expanding Facilities - City of Burbank Landfill No. 2** | A permitting strategy has been proposed to develop a 200 ton per day (TPD) covered aerated static pile (CASP) compost operation on top of Burbank Landfill No. 3. The facility could be built in two phases of 100 TPD each, to handle the City of Burbank's commercial and residential organics, thereby demonstrating 15-years of organic processing capacity. This type of CASP compost technology has been determined to be the best available control technologies (BACT) determined by the South Coast Air Quality Management District. While mitigating methane from the organic waste that is being landfilled, air emissions would be reduced by over 80% in the regulated CASP system where odor is minimized following an odor control plan. A CASP system will be right-sized at 100

tons-per-day with fan units to blow air though the organic waste to compost the material. Operations could start by January 1, 2022, to harmonize with the effective date of the AB 1383 regulations.

AB 876 requires the City of Burbank to demonstrate 15-years of organic processing capacity, and SB 1383 requires that 75% of organics be reduced from landfilling by 2025. The City of Burbank currently handles up to a peak of 100 TPD of green waste and will be adding up to 10 TPD of residential manure from horse properties. The sizing of the CASP compost facility could be 200 TPD.

**Efforts of which the City of Burbank is aware that are underway to develop new private or public regional organic waste recycling facilities that may serve some or all of the organic waste recycling needs of the commercial waste generators within the jurisdiction subject to this chapter, and the anticipated timeframe for completion of those facilities.**

The City of Burbank is investigating the development of an exclusive compost facility to secure 15 years of organic processing capacity for the City's needs which will reduce the hauling of material to far away regional compost facilities. Instead the material would be kept local and produce compost for local use at city parks and for use by local residents.

The private material recovery and transfer stations in the area may be offering organic waste processing services in the near future to address AB 1826 programs where the material could be hauled away to regional compost facilities. Information from permitting documents available through CalRecycle's Facility Identification Tool (FACIT) and Solid Waste Information System (SWIS). Facilities with annual cubic yard limits, instead of tonnage limits, are converted to tons using a conversion factor of 275 pounds per cubic yard, per CalRecycle's "Mandatory Commercial Organics – Stakeholder Workshop – Item 4". The Los Angeles County permitted organic waste processing capacity is provided in **Appendix E**, and the reference sources are linked below from CalRecycle. There is 1.2 million tons of permitted capacity in Los Angeles County as summarized in the Table 4 below. A list of these facilities are also provided in **Appendix E.**

**SWIS/Facit Database:** http://www.calrecycle.ca.gov/FacIT/Facility/Search.aspx#LIST

**CalRecycle Workshop Weight Conversion:**
http://www.calrecycle.ca.gov/Actions/Documents%5C77%5C20152015%5C1320%5CHandout%20-%20Generation%20ID%20tool%20updated.pdf

**Table 7 – Summary of Capacity by Type**

| Summary Of Capacity By Type (tons per year) | |
|---|---|
| Green Waste | 1,214,031 |
| Food Waste | 35,340 |
| **Total** | **1,249,371** |

**Identify closed or abandoned sites that might be available for new organic waste recycling facilities.**

A permitting strategy has been proposed to develop a 200 ton per day (TPD) covered aerated static pile (CASP) compost operation on top of the closed portions of Burbank Landfill No. 2.

**Identify other non-disposal opportunities and markets.**

The organic waste would be kept local at the proposed City Landfill No. 2 site and would produce compost for local use at city parks and for use by residents.

The SB 1383 regulations shall also include requirements intended to meet the goal that not less than 20% of edible food that is currently disposed of is recovered for human consumption by 2025. Food rescue goals are 20% diversion of edible food waste, which has been estimated to be **1,711 tons in 2018** given the latest waste characterization**.** Given this, Burbank should be on track to recover **342 tons** for food rescue programs. Should the City of Burbank want to apply for CalRecycle grants to develop their proposed compost facility, a food rescue program is a key component of being eligible to apply for that grant.

StopWaste of Alameda County has a well-developed outreach program where they focus on medium to large generators (defined as $300-750,000 on food purchases) where they subsidize the purchase of a food tracking system and make them agree to a 20% source reduction goal and conduct onsite trainings. All but one entity exceeded that goal, and all continued with the program after the StopWaste training was over. The City of Burbank could consider a similar program in the future. The largest salvageable product is milk (over 50% in one case) followed by fruits, which can be circulated back to children who are food insecure.

CalRecycle has set definitions for "Tier One" and "Tier Two" generators to direct outreach and programs. Tier One generators are the most prioritized businesses for food rescue. Tier One includes grocery stores, wholesalers, and supermarkets given certain size parameters. Tier Two generators include hotels, restaurants, public agencies with cafeterias, hospitals, and large events. This allows for another tool to identify potentially divertible edible food for rescue. Public business databases in conjunction with this CalRecycle guidance, provides a starting point for determining which businesses to approach for food rescue programs. **Appendix F** provides an edible food generators list as a starting point for these programs.

Additionally, the City may look for opportunities to identify and develop a food recovery kitchen, which specializes in reprocessing near spoiled food material that is sourced from food banks and pantry locations. In addition, these kitchens can handle bulky food items that are difficult to distribute to recipients.

The City of Burbank could establish a networking agent to get food rescue groups in the same room to look for opportunities for collaboration where there are current gaps in the system. The would benefit from the opportunity to meet and discuss challenges and solutions. Advertising gleaners to residents is another option for outreach, as well as a StopWaste-like programs, investing in a food recovery kitchen and looking for sustainable funding for supporting food recovery. The number one challenge is educating customers on the Good Samaritan law, but all groups said the more they see large customers doing it (large grocery stores and other restaurants) the more inclined customers are to participate. Providing education and technology apps to customers is important too, as well as tax incentives and scope of the problem/solutions. (For example, 5% of San Diego County's disposed organics would solve their food shortage issues with underprivileged communities if redirected to them.)

**Review zoning and permit requirements for the location of new organic waste recycling facilities.**

The siting of a commercial-scale compost facility on top of a landfill requires proper zoning and will require a conditional use permit and thorough environmental analysis. The proposed compost facility will not be a regional facility and will be right sized to exclusively handle the City of Burbank's materials. Even with a moderately sized facility, land use and environmental review is required, and local zoning does not prohibit composting on top of a landfill.

Smaller types of community composting operations are excluded from State permitting such as backyard composting, vermicomposting, mushroom composting, and community gardens. According to the revised State compost regulations effective January 1, 2016, composting green material, agricultural material, food material, and vegetative food material, alone or in combination, is an excluded activity if the total amount of feedstock and compost on-site at any one time does not exceed 100 cubic yards and 750 square feet. Local zoning typically does not prohibit small scale composting of less than 100 cubic yards, and these sites do not normally cause a nuisance if properly managed.

*Burbank Composts* has been active offering *The Homegrown Solution!* composting workshops at the Burbank Recycling Center with 7 workshops being offered this fall alone. The classes are fun, interactive and packed with information to transform the organic waste into a rich spoil product. Parlaying off this successful community program, the city could explore taking this concept to community garden and City parks that would be limited to 100 cubic yards of material, which would equate to just over two transfer trailer loads. There may be some local permitting required on best management practices to expand the program beyond the backyard and could include food scraps and yard clippings.

Green material composting may be sized up to 12,500 cubic yards of on-site at any one time and cannot include any food waste. These types of operations are permitted under an Enforcement Agency Notification Tier, which would be inspected by the County Health officials on a monthly basis and requires an odor control plan. Some community-scale green material composting may be sized up to 5,000 cubic yards of material - about one transfer truck per day of yard clippings. This type of operations could be sized to fit within City parks, but would require zoning review and environmental analysis to determine any potential risk to the adjacent community. Local landscapers teamed with City parks personnel could consider this type of community-scale compost for yard clippings as a way to reduce traffic trips and provide a local source of composting.

**Identify incentives available, if any, for developing new organic waste recycling facilities within the jurisdiction.**

**State Grants** | The State has been offering incentives with grants and loans to composting facilities. The Greenhouse Gas Reduction Fund was established in 2012 to receive Cap-and-Trade auction proceeds appropriated for projects that support the goals of AB 32. Also known as the California Climate Investments program, eligible investments include reducing GHG emissions through increased in-state diversion of municipal solid waste from disposal through composting.

CalRecycle established the Greenhouse Gas Reduction Grant and Loan Programs to provide financial incentives for capital investments in infrastructure for aerobic composting, anaerobic digestion and recycling and manufacturing facilities that will reduce greenhouse gas emissions. A priority is to realize environmental and economic benefits in disadvantaged communities and shovel-ready projects. These grants of up to $3 million each have promoted California infrastructure developments that achieve greenhouse gas emission reductions by diverting more materials from landfills and producing beneficial products such as soil amendments and compost, renewable fuels or recycled-content products. Grants are targeted to build or expand organics infrastructure, such as composting and anaerobic digestion, or rescuing food to feed hungry people, as well as new or expanded infrastructure for manufacturing products with recycled content fiber, plastic, or glass.

The proposed compost operations on top of Burbank Landfill No. 2 would be eligible for a CalRecycle grant of up to $3 million with matching funds once the environmental analysis in nearing completion sometime in 2021 should the City of Burbank pursue this local option, and should grants be available. The grant

application would need to include the reduction of negative impacts to disadvantaged communities by not having Burbank's food waste be transferred out of these communities to regional composting facilities in the Central Valley. Plus, the grant application would likely need to include a food rescue program and have a community benefits arrangement to support non-profit groups that assist in the health and welfare of disadvantaged groups.

**AB 1826 and AB 1383 Implementation Fees** | AB 1826 is permissive on local fee collection, whereby a local governmental agency may charge and collect a fee from an organic waste generator to recover the local governmental agency's costs incurred in complying with the law. No reimbursement is required by AB 1826 because a local agency has the authority to levy service charges, fees, or assessments sufficient enough to pay for the program or level of service mandated by AB 1826.

SB 1383 goes further and allows penalties to be levied. SB 1383 allows local jurisdictions to impose requirements on generators or other relevant entities within their jurisdiction and may authorize local jurisdictions to impose penalties on generators for noncompliance. By adding to the duties of local governments related to organic waste in landfills, SB 1383 would impose a state-mandated local program. If CalRecycle determines that significant progress has not been made, they may include incentives or additional requirements in the regulations to facilitate progress towards achieving the organic waste reduction goals for 2020 and 2025.

The City of Burbank could consider the fee authority allowed by both AB 1826 on commercial generations and SB 1383 for all organic processing programs in their efforts and structure those fees to provide incentives to develop organic collection and processing programs.

**Identify barriers to siting new or expanded compostable materials handling operations and specify a plan to remedy those barriers within the City.**

The City of Burbank is commercially intensive with an employment of 143,464 people versus its resident population of only 105,543. There are not enough open spaces or the proper agricultural zoning to support traditional composting. Stand-alone anaerobic digestion facilities exclusive to the city's organics would not be cost effective at that scale. With cheap landfill pricing in the region, many alternatives for diversion could require a price shock to the current system, similar to what the City of Los Angeles experienced when implementing their franchise system for the commercial sector incorporating AB 1826.

A permitting strategy has been proposed to develop a 200 ton per day covered aerated static pile (CASP) compost operation on top of the closed portions of Burbank Landfill No. 2. The facility could be built in two phases of 100 TPD each, to handle the City of Burbank's commercial and residential organics, thereby demonstrating 15-years of organic processing capacity. This type of CASP compost technology has been determined to be the best available control technologies (BACT) determined by the South Coast Air Quality Management District. The following barriers may emerge during the permitting process:

- Cost of new CASP technology at community-scale against cheaper landfill tip fees for commercial waste, which would need to be remedied by adjusting the city rate structure
  Odor control near a residential community, which would be remedied by CASP technology and a robust odor control plan.