March 1, 2013

NOTICE

TO: Certified Operators Purchasing from Multiple Curbside, Community Service, and/or Dropoff or Collection Programs

Subject: Curbside Allocation Methodology

A review of our database indicates that your company may purchase and report California Refund Value (CRV) beverage containers from more than one curbside program, community service program, and/or dropoff or collection program. Since material from multiple programs is typically mixed together prior to being sorted, determining how to correctly allocate material to each program can be difficult.

The Department of Resources Recycling and Recovery (CalRecycle) allows operators of processing facilities and recycling centers to request the use of an allocation methodology for reporting material purchases. The method for allocating material typically uses characterization studies and/or tonnage comparisons to determine the volume that should be allocated to each program from which you purchase material. If material is not properly allocated, waste diversion can be inaccurately reported and certified and/or registered programs may not receive accurate CRV and Curbside Supplemental Payments.

If a processor or recycling center chooses not to apply for an allocation methodology, it must submit a separate shipping report (DR6) for each material type in every load that is purchased. For example, if the load contains four materials that are eligible for CRV, you must complete and submit four shipping reports. If you purchase material from ten programs per day, with four material types in each load, you are required to complete and submit forty (40) shipping reports per day. This requirement is manageable if the received material is kept separate from all other materials. But if the material is mixed with materials from other programs, the recordkeeping and reporting workload for the operator can be significant.

CalRecycle is hereby requesting all processors and recyclers purchasing materials from more than one curbside program, community service program, and/or dropoff or collection program to submit an application to request the use, or continued use, of an allocation methodology. All applications must be received by April 1, 2013. If no application is received by April 10, 2013, you will be contacted for a site visit. The site visit will be used to determine the need for an allocation methodology and to fill out the
application. Those entities that already have an approved allocation methodology are also required to complete and submit the new application. The new application requests information that is more applicable to current business practices.

You can access the allocation methodology application electronically on the CalRecycle Web site at http://www.calrecycle.ca.gov/BevContainer/CertOperator/AltMethod/. You can complete the application electronically and print it out or complete the blank application manually (see Attachment). Upon receipt of a completed application, the Division will either approve or deny your request within 45 calendar days.

To request an application or for more information regarding allocation methodologies, please contact Ralph Taylor at (916) 323-5778 or Ralph.Taylor@CalRecycle.ca.gov.

Sincerely,

Jose Ortiz
Deputy Director
for Recycling

Attachment