



## Calendar Year 2014 Recycling Reporting Guidance

### I. Purpose

To determine the extent to which recycling is occurring, Title 7 §6056(a) requires all persons, including persons who collect, process or market recyclables, with the exception of those specified in §6053(e), must report to the Department on a calendar year basis, no later than February 15th of the following year, the type and quantity of recyclables managed, the method of recycling collection used (single or multiple streams), and the location of the recycling facilities used. The following guidance shall apply to recyclables generation data for calendar year 2014.

### II. Definitions

Notwithstanding any definitions in Chapters 60 or 64 of Title 7 to the contrary, the following words and phrases shall have the meaning ascribed to them in this guidance unless the context clearly indicates otherwise.

- (a) 'Authority' means the Delaware Solid Waste Authority.
- (b) 'Commercial and Institutional Recyclables' means any recyclable material that is generated by stores, offices, restaurants, warehouses, and other manufacturing, industrial or processing activities, and enterprises such as social, charitable, educational, and government services.
- (c) 'Department' means Delaware Department of Natural Resources and Environmental Control.
- (d) 'End user of recyclables' means facilities that purchase or secure recovered materials for the purpose of recycling. Examples include recycling plants and composting facilities. Excludes waste disposal facilities.
- (d) 'Independent Recycling Collector/Hauler' means a person who provides recyclables collection services.
- (e) 'Multi-family' means 3 or more attached structures, such as condominiums or apartments, generally intended for occupancy by individuals or families and where centralized community trash disposal and collection services are typically provided.
- (f) 'Person(s)' means any municipality or commercial business (exclusive of households) who arranges for the recycling or beneficial reuse of Recyclable Material off-site (whether in Delaware or out-side of Delaware), including: all independent recycling collectors/haulers; self marketing generators; processors of recyclable materials; end users of recyclables; and all municipalities or other units of government in Delaware who collect, self market, or contract for collection of Recyclable Materials.

(g) 'Processor of Recyclable Material' means a person that handles recyclable materials from collectors and generators for the purpose of preparing materials for recycling (material recovery facilities, scrap metal yards, paper dealers, and glass beneficiation plants, etc.). Processors act as intermediaries/brokers between collectors and end users of recovered materials.

(h) 'Recyclable Material' or 'Recyclables' means any material or group of materials that can be collected and sold or used for recycling or beneficial reuse.

(i) 'Recycling' means the process by which solid wastes are separated for use as raw materials, products or replacement of products, including the beneficial reuse of organic wastes, but does not include the incineration of materials for energy.

(j) 'Residential Waste' means the solid waste generated in occupied single-family and multi-family structures, also referred to as 'Household Waste.'

(k) 'Self-Marketing Generator' means a person that directly markets the recyclables generated by their business to a Processor of Recyclable Material or an End User.

(l) 'Single Stream' means a system in which all fibers (including but not limited to paper, cardboard, etc.) and containers (including but not limited to plastic, glass and metal) are commingled for collection into one container instead of being sorted into separate commodities and multiple containers.

(m) 'Single-family' means either a detached structure (i.e. a house) surrounded by open space or attached structures, such as town or row homes, generally intended for occupancy by a family and where individual trash collection services are typically provided for each structure.

(n) 'Source Separated' means recyclable materials, including single stream recyclables, which are segregated at the point of generation and kept apart from the waste stream by the generator thereof for the purpose of collection and recycling.

### III. Reporting Requirements

The information required in the *Annual Recycling Activity Report* is necessary to determine statewide diversion rates of recyclables, to determine compliance with the recycling reporting requirements and to provide accurate and comprehensive information in aggregate on the type and amounts of residential, commercial and institutional recyclables generated and diverted from disposal in Delaware. The information required on the reporting form shall be reported to the Department no later than February 15<sup>th</sup> of each calendar year for the previous calendar year. Specifically, the following information shall be reported:

(a) The type and corresponding weight in tons of each recyclable material collected for the purpose of recycling for the following sources:

(i) Single-family residential;

(ii) Multi-family residential and;

(iii) Commercial & Institutional.

(b) The information required in paragraph (a) of this subsection shall be reported in the following manner:

(i) The weight of material collected shall be determined either by direct measurement or by determining the weight of material sold or otherwise sent off-site or used on-site for recycling during the calendar year, adjusted by the difference in weight of material held in inventory on the first day and last day of the calendar year;

(ii) In cases where a reporting person is unable to provide exact weight information for the categories identified in paragraph (a)(i),(ii) & (iii) of this subsection, reasonable estimates allocating the weight of recyclable material from each source shall be made inclusive of an explanation of the method of estimation used.

(c) Municipal Government Reporting Requirements/Reporting Exemption:

Those municipal governments that collect and deliver all of their recyclables to an Authority recycling facility are exempt from these reporting requirements. However, the Authority shall report to the Department the tonnage of recyclables delivered to the Authority for each municipality that self hauls. Where necessary to estimate between single-family, multi-family and commercial & institutional recyclables delivered by an exempt municipality the reporting requirements of paragraph b(ii) of this subsection shall apply to the quantities reported by the Authority on behalf of the municipality. If a municipality chooses to deliver its recyclables to a location other than the Authority, then it shall be required to self report the disposition of those recyclables as required in section IV(a) & (b) of this guidance.

## **V. Report Submission and Management of Confidential Information**

DSM Environmental Services, Inc. has been contracted to collect, collate and generate the aggregated materials data from the required recycling reports such that no individual company data is reported to the Department or the public thereby maintaining the confidentiality of individual company data. To the extent that generators of recyclables are already known, and as new generators are discovered, they will be emailed the following attachments:

- Attachment A is the Department's letter explaining the requirement to report.
- Attachment B is DSM's letter explaining the reporting process.
- Attachment C is the actual reporting form.
- Attachment D is an example of how the aggregated data is reported by the Department.

It is requested that all reports be delivered directly to DSM via fax or email as indicated on the reporting form.

If the decision is ever made to have this information reported directly to DNREC please note that the Department's Freedom of Information Act (FOIA) requirements specify the procedures and criteria under which a person may request that certain records or portions of records submitted to the Department be held confidential. For more information visit the Department's FOIA regulation at: <http://www.dnrec.de.us/dnrec2000/FOIA.pdf>



STATE OF DELAWARE  
DEPARTMENT OF NATURAL RESOURCES  
& ENVIRONMENTAL CONTROL  
DIVISION OF WASTE AND HAZARDOUS SUBSTANCES  
89 KINGS HIGHWAY  
DOVER, DELAWARE 19901

OFFICE OF THE  
DIRECTOR

TELEPHONE: (302) 739-9400  
FAX: (302) 739-1894

January 21, 2015

Subject: Calendar Year 2014 Annual Recycling Report Due February 15, 2015

Dear Recyclables Generator:

This letter serves as a reminder that your company's calendar year **2014** recycling activity data is due February 15, 2015. The Delaware Solid Waste Recycling Law (a.k.a. Universal Recycling Law), specifically *7 Del. C. §6056(1)*, makes reporting the type and quantity of recyclables generated mandatory. The first effective reporting deadline was February 15, 2012 for the recycling activity that took place in calendar year 2011. This is the fourth year of this mandatory reporting requirement and it continues annually. So each February 15<sup>th</sup>, the data for the previous calendar year is due.

If you are amongst the majority of respondents that reported recyclables generation data previously, thank you for your response. As Delaware's Recycling Public Advisory Council's (RPAC) responsibilities include advising the legislature on recycling policy for Delaware, accurate information is critical to making practical recommendations. The requested information is also critical to accurately calculate the state's recyclables diversion rate and track progress toward meeting the State's established recycling goals. This cannot be achieved if those persons responsible for managing recyclables fail to report.

If you did not respond previously, **please be aware that reporting is mandatory** and that *7 Del. C. § 6059* affords the Department enforcement authority, inclusive of the ability to impose monetary fines of \$100 to \$500 for each day of violation. While this enforcement option was not exercised during the first year transition period of mandatory reporting, the Department intends to pursue one hundred percent compliance going forward.

DSM Environmental Services, Inc. (DSM) worked with the RPAC to design the reporting survey and has used the survey to collect and aggregate data on an annual basis, under both voluntary and mandatory reporting requirements, for several years now. DSM offers survey participants the option of keeping their report confidential, and aggregates the survey data in its annual report to the RPAC to assure that individual company data are not reported. DSM also analyzes the data to ensure double counting does not occur and determines the total quantity of materials recycled in Delaware. This aggregated data is then supplied to the RPAC for the purpose of verifying and reporting Delaware's recyclables diversion rate. This process has worked well and for this reason DSM will also manage calendar year 2014 survey data.

The most recent RPAC annual report, which includes in Appendix C of the report the aggregated recycling data from DSM can be found at:

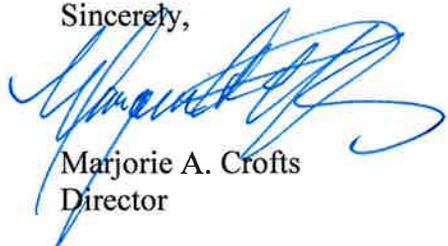
<http://www.dnrec.delaware.gov/dwhs/Recycling/Documents/The%20Thirteenth%20Annual%20RPAC%20Report.pdf>

To view the Department's recycling reporting guidance please visit:

[http://www.dnrec.delaware.gov/dwhs/recycling/Documents/2012%20Recycling%20Reporting%20Guidance%20\(2\).pdf](http://www.dnrec.delaware.gov/dwhs/recycling/Documents/2012%20Recycling%20Reporting%20Guidance%20(2).pdf)

Attached to this letter you will find DSM's letter requesting the recycling data and the 2014 reporting form (due February 15, 2015). If you have any questions regarding "completion of the reporting form" please call Natalie Starr or Marissa Ambrosi of DSM at 802-674-2840. If you have questions about the mandatory reporting requirement please contact James Short or Bill Miller of my staff at 302-739-9403 x8. I thank you in advance for your cooperation and commend you for your ongoing recycling efforts.

Sincerely,



Marjorie A. Crofts  
Director

cc: BJ Vinton, Chair RPAC  
Mike Parkowski, DSWA

January 19, 2015

Re: **Delaware Recycling Report for Calendar Year 2014**

To Whom It May Concern:

DSM Environmental Services, Inc. (DSM), with funding from the Delaware Solid Waste Authority, is once again working with the Delaware Department of Natural Resources and Environmental Control (DNREC) and the Delaware Recycling Public Advisory Council (RPAC) to complete the annual survey of all generators, haulers and brokers of recyclables in the State of Delaware during calendar year 2014. As indicated in the letter from DNREC, **reporting is now mandatory and due by February 15, 2015.** The resulting survey data will be compiled to become part of RPAC's required annual report to the Legislature on Delaware's recycling rate. For more information on RPAC's recycling reports, see: <http://www.dnrec.delaware.gov/dwhs/info/pages/rpac.aspx>.

DSM is once again acting as an independent third party to carry out the survey and offer survey participants the opportunity for their data to remain confidential. Survey data collected will be aggregated by the weight of each material type for reporting purposes. No individual company data will be reported. Please refer to *Appendix C, Table 2 and 3* of the following web link to view how the data collected will be reported to and used by RPAC: <http://www.dnrec.delaware.gov/dwhs/Recycling/Documents/The%20Thirteenth%20Annual%20RPAC%20Report.pdf>

Please report the weight of material collected, either by direct measurement or by determining the weight of material sold or otherwise sent off-site or used on-site for recycling during the calendar year 2014, adjusted by the difference in weight of material held in inventory on the first and last day of the calendar year. If you are unable to provide exact weight information, reasonable estimates allocating the weight of recyclable material from each source should be made. If you are using estimation methods to report, we request that you follow the same protocol from year to year in order to maintain consistency. Please also indicate whether the material came from residential or commercial sources. By doing so calculation of both a residential and commercial recycling rate for Delaware is possible. If the material came from both residential and commercial sources, estimate the percentage from each type of generator. We also ask you to list where materials are sent for processing or marketing so that we can avoid double counting of material reported.

Along with the letter from DNREC explaining the mandatory reporting requirement, I have also enclosed the reporting form for 2014. Please fill out the form with the amount of material your company recycled in 2014 and email or fax it back to DSM.

A copy of the form is also available for download on our website: [www.dsmenvironmental.com](http://www.dsmenvironmental.com). Note that the form link is located at the bottom of the main page "Active Project Resources" – this will bring you to PDF files available for download. There is both an electronic version of the CY 2014 recycling survey and a hard copy of the CY 2014 recycling survey. A direct link is: <http://www.dsmenvironmental.com/active-project-resources>

Please e-mail, fax or mail back the completed survey form to DSM. Do not send the form to DNREC.

You can either e-mail the form to:

[DSM@DSMEnvironmental.com](mailto:DSM@DSMEnvironmental.com)

Fax it back to our office at: **(802) 674-6915**.

Or mail it to:

**DSM Environmental Services, Inc.**

**PO BOX 2**

**Windsor, VT 05089**

If you submit the form through the electronic process, please follow these instructions:

1. Open the Electronic Form in Adobe (by downloading the form first).
2. Fill out the relevant fields as you normally would.
3. Make certain you include a correct email address in the email field, as a confirmation of receipt notification will be sent back to you.
4. Once you have completed the form, double check your work before you hit the submit button (found in the top right hand corner.)
5. Submit the form (Note that this requires that you be connected to the internet, and that the process may take up to a minute to complete.)
6. Once the submission is complete, a message will appear on your screen that says "*Thank you for completing the DSWA 2014 Recycling Survey Form.*"
7. You should then receive a confirmation email to the email address entered.
8. Following submission, we recommend you save a copy of the completed PDF file and/or print a hard copy for your records.

### ***Need Help or More Information?***

If you have any questions about completion of the reporting form, please contact Marissa Ambrosi by e-mail at [marissa@dsmenvironmental.com](mailto:marissa@dsmenvironmental.com) or call me directly at (802) 674-2840 ext. 102.

If you have questions about the reporting law or the deadline, please contact James Short or Bill Miller at DNREC at 302-739-9403 x8.

Thank you again for your help on this important initiative for Delaware.

Regards,

DSM Environmental Services, Inc.



Natalie Starr

## Additional Explanation of Information Requested on the Recycling Survey Form:

Below is the main component of the Recycling Reporting Form with some additional information that may be helpful to you in completing the form. If you have questions about how to complete this form, please do not hesitate to contact DSM Environmental Services at:

E-mail: [DSM@DSMEnvironmental.com](mailto:DSM@DSMEnvironmental.com) Mailing Address: DSM Environmental Services, Inc.  
 Telephone: (802) 674-2840 Ext. 102 PO Box 2  
 Fax: (802) 674-6915 Windsor, VT 05089

Additional Explanation of Information Requested on the Recycling Survey Form				
Example of Materials Typically Reported for Recycling	Description of Information Requested:			
	Company or location where you send the material for Recycling, Processing or End Use	Percent Commercial (%)	Percent Residential (%)	Approximate percent of material originating from Delaware only
Corrugated Cardboard	<i>This information is important so that DSM does not double count material that is handled by another recycler that participates in the survey. If you broker direct to an end user outside of Delaware, and you would prefer not to list them, just list "End-User outside of DE" on the form. Please understand that we may need to contact you for more information to confirm that double counting has not occurred.</i>	<i>Percentage of each material listed originating from businesses, industry, or institutions. This is important so that a commercial recycling rate can be separately calculated for Delaware.</i>	<i>Percentage of each material listed originating from residential sources. This is important so that a residential recycling rate can be separately calculated for Delaware.</i>	<i>Percentage of each material listed originating from generators located in Delaware as opposed to out of State. The recycling rate must be calculated from Delaware generated materials that are recycled only.</i>
Mixed Paper				
Newspaper				
Office Paper				
Glass Bottles and Containers				
Plastic Bottles and Containers				
Aluminum Cans				
Mixed Recyclables or Single Stream				
Retail Bags				
Shrink Wrap				
Pallets				
Mixed Plastics (non-industrial)				
Textiles				
Carpet (and Padding)				
Electronics				
Fluorescent Bulbs				
Oil Filters				
Tires (used in engineered products, retreaded or otherwise recycled but not burned)				
Lead Acid Batteries				
Other Batteries				
White Goods/Appliances				
Food Waste				
Fats-Oils-Grease				
Leaf and Yard Waste				
Trees and Branches				
Clean Wood				
Construction and Demolition Wastes				
Asphalt, Brick and Concrete				
Agricultural Wastes				
Other Metals				
Other Material, please list:				



Attachment D

“Example of Aggregated Recycling Data”

Please see **TABLE 2: COMPARISON OF MSW MATERIALS RECYCLED IN DELAWARE, CY 2013, 2012, 2011 AND 2010** from the report (please click on link to view full report) [State of Delaware Assessment of Municipal Solid Waste Recycling For Calendar Year 2013](#).

Table 2:

Material Category	CY 2013			CY 2012			CY 2011			CY 2010			Difference, 2013 - 2012			
	All Other (tons)	DSWA (tons)	Total (tons)	All Other (tons)	DSWA (tons)	Total (tons)	All Other (tons)	DSWA (tons)	Total (tons)	All Other (tons)	DSWA (tons)	Total (tons)	All Other (tons)	DSWA (tons)	% Diff	Total (tons)
<b>Paper, Paper Packaging</b>																
Corrugated (OCC)	59,684	0	59,684	53,288	252	53,540	56,796	7,553	64,349	50,954	7,553	58,507	6,396	-252	11.48%	6,144
Newspaper (ONP)	2,824		2,824	909		909	2,369		2,369	1,769		1,769	1,915		210.65%	1,915
Some-ell Office Paper (O)	5,775		5,775	5,001		5,001	5,078		5,078	7,449		7,449	774		15.48%	774
Mixed Paper (2)	15,328		15,328	8,174		8,174	8,064		8,064	5,041		5,041	7,154		87.52%	7,154
<b>Subtotal:</b>	<b>83,611</b>	<b>0</b>	<b>83,611</b>	<b>67,372</b>	<b>252</b>	<b>67,624</b>	<b>69,449</b>	<b>2,858</b>	<b>72,307</b>	<b>65,212</b>	<b>7,553</b>	<b>72,765</b>	<b>16,239</b>	<b>-252</b>	<b>23.64%</b>	<b>15,987</b>
<b>All Other Packaging</b>																
Glass (3)	170		170	332		332	208		208	4,011		4,011	-162		-48.85%	-162
Plastic Film /Wrap (4)	601		601	1,452		1,452	974		974	425		425	-851		-58.64%	-851
Plastic Containers	118		118	30		30	223		223	37		37	88		294.98%	88
Aluminum Cans (5)	2,277		2,277	696		696	728		728	546		546	1,581		227.13%	1,581
Pallets (6)	4,278		4,278	4,714		4,714	3,842		3,842	4,186		4,186	-436		-9.24%	-436
Mixed Recyclables (7)	110,799		110,799	33,079	62,211	95,290	70,135	34,000	104,135	4,755	39,051	43,806	77,720	-62,211	16.28%	15,509
<b>Subtotal:</b>	<b>118,243</b>	<b>0</b>	<b>118,243</b>	<b>40,303</b>	<b>62,211</b>	<b>102,514</b>	<b>21,979</b>	<b>54,133</b>	<b>76,111</b>	<b>13,960</b>	<b>39,051</b>	<b>53,011</b>	<b>77,940</b>	<b>-62,211</b>	<b>15.34%</b>	<b>15,729</b>
<b>Vehicle Waste</b>																
Tires (8)	2,226	0	2,226	3,110	951	4,061	7,820	989	8,809	5,049		5,049	-884	-951	-45.18%	-1,835
Lead Acid Batteries (9)	3,472		3,472	2,052		2,052	2,341		2,341	1,893		1,893	1,420		69.18%	1,420
Oil Filters	452		452	379	0	379	292	NA	292	724	425	1,148	73		19.33%	73
<b>Subtotal:</b>	<b>6,150</b>	<b>0</b>	<b>6,150</b>	<b>5,541</b>	<b>951</b>	<b>6,492</b>	<b>9,407</b>	<b>1,047</b>	<b>10,454</b>	<b>4,843</b>	<b>425</b>	<b>5,267</b>	<b>609</b>	<b>-951</b>	<b>-5.27%</b>	<b>-342</b>
<b>Special Wastes</b>																
Carpet	140		140	140		140	742		742	422		422				
Textiles (10)	2,188		2,188	4,284		4,284	4,946		4,946	4,413		4,413	-2,096		-48.92%	-2,096
Florescent Bulbs	19		19	15		15	8		8	7		7	4		29.80%	4
Electronic Goods	903	1,717	2,620	839	1,933	2,772	2,123	1,283	3,406	241	1,909	2,151	64	-216	-5.49%	-152
Other Batteries	16	71	87	3	44	47	96	48	144	101		101	13	27	85.36%	40
<b>Subtotal:</b>	<b>3,267</b>	<b>1,788</b>	<b>5,055</b>	<b>5,281</b>	<b>1,977</b>	<b>7,258</b>	<b>5,984</b>	<b>1,930</b>	<b>7,914</b>	<b>5,185</b>	<b>1,909</b>	<b>7,094</b>	<b>-2,014</b>	<b>-189</b>	<b>-30.36%</b>	<b>-2,203</b>
<b>Organic Wastes</b>																
Fats, Oil, Grease	8,802		8,802	5,103		5,103	4,029		4,029	3,557		3,557	3,699		72.49%	3,699
Food Waste	17,626		17,626	12,701		12,701	7,624		7,624	11,904		11,904	4,925		38.77%	4,925
Leaf and Yard Waste	121,514		121,514	126,463	0	126,463	120,867	4,000	124,867	95,594	14,865	110,459	-4,949		-3.91%	-4,949
Trees and Branches	59,125		59,125	44,888		44,888	68,157		68,157	53,580		53,580	14,237		31.72%	14,237
Clean Wood	4,756		4,756	5,410		5,410	5,152		5,152	2,371		2,371	-654		-12.10%	-654
<b>Subtotal:</b>	<b>211,822</b>	<b>0</b>	<b>211,822</b>	<b>194,565</b>	<b>0</b>	<b>194,565</b>	<b>201,718</b>	<b>4,111</b>	<b>205,829</b>	<b>167,007</b>	<b>14,865</b>	<b>181,872</b>	<b>17,257</b>	<b>0</b>	<b>8.87%</b>	<b>17,257</b>
<b>Metals</b>																
White Goods (11)	22,178	790	22,968	19,454	458	19,912	19,212	768	19,980	21,676	973	22,649	2,724	332	15.35%	3,056
<b>Subtotal:</b>	<b>22,178</b>	<b>790</b>	<b>22,968</b>	<b>19,454</b>	<b>458</b>	<b>19,912</b>	<b>18,444</b>	<b>768</b>	<b>19,212</b>	<b>21,676</b>	<b>973</b>	<b>22,649</b>	<b>2,724</b>	<b>332</b>	<b>15.35%</b>	<b>3,056</b>
<b>Other</b>																
Mixed Plastics (12)	2,645	6	2,651	3,965	0	3,965	2,063	0	2,063	2,705	0	2,705	-1,320	6	-33.15%	-1,314
<b>Subtotal:</b>	<b>2,645</b>	<b>6</b>	<b>2,651</b>	<b>3,965</b>	<b>0</b>	<b>3,965</b>	<b>2,063</b>	<b>0</b>	<b>2,063</b>	<b>2,705</b>	<b>0</b>	<b>2,705</b>	<b>-1,320</b>	<b>6</b>	<b>-33.15%</b>	<b>-1,314</b>
<b>Total</b>	<b>447,915</b>	<b>2,590</b>	<b>450,499</b>	<b>336,481</b>	<b>65,849</b>	<b>402,330</b>	<b>329,045</b>	<b>64,846</b>	<b>393,891</b>	<b>280,588</b>	<b>64,776</b>	<b>345,364</b>	<b>111,434</b>	<b>-63,265</b>	<b>11.97%</b>	<b>48,169</b>