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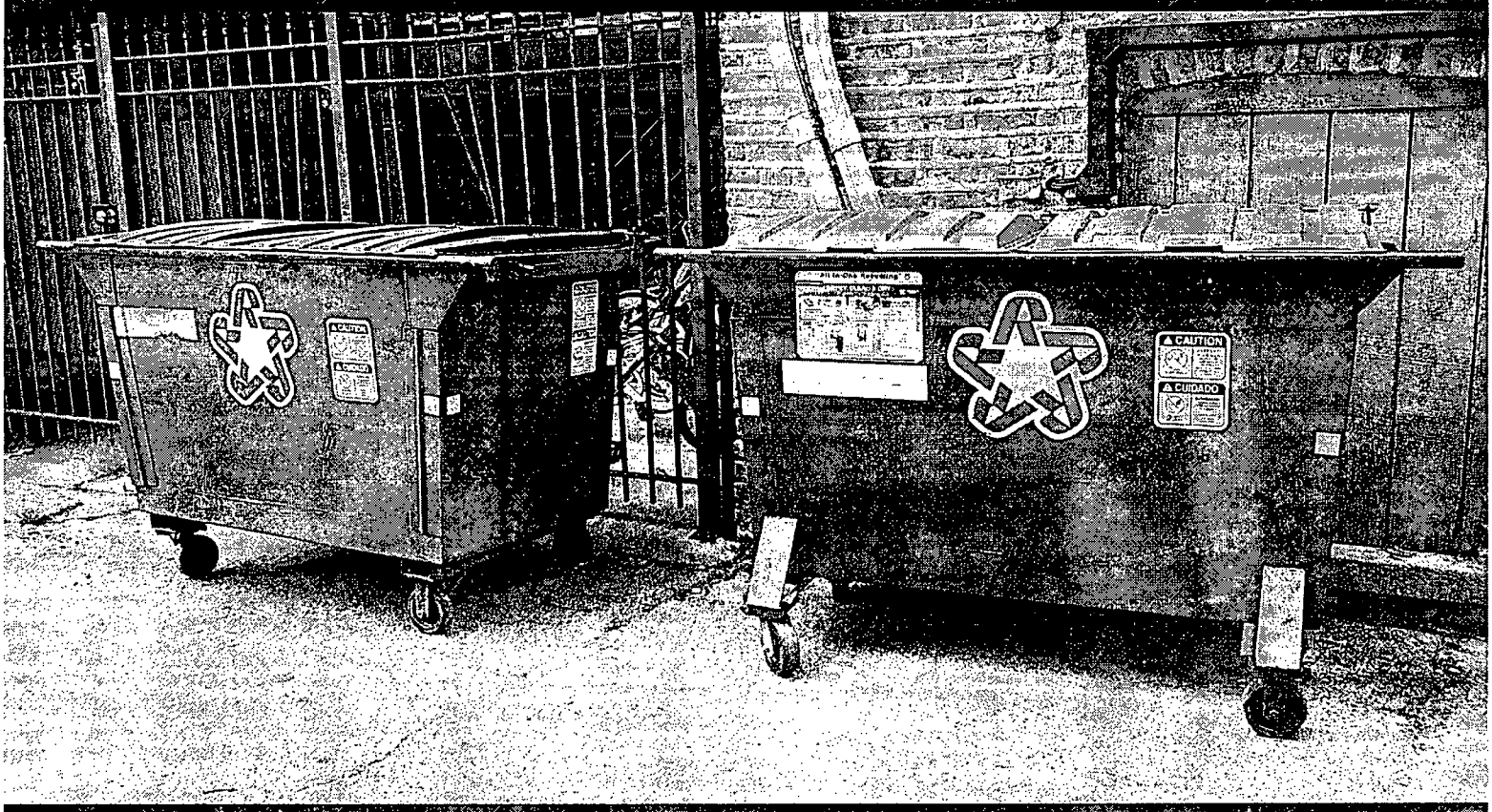
DECEMBER 2020

CITY OF CHICAGO
OFFICE OF INSPECTOR GENERAL

DEPARTMENT OF STREETS AND SANITATION COMMERCIAL AND HIGH-DENSITY RESIDENTIAL RECYCLING ENFORCEMENT AUDIT



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DECEMBER 2, 2020

TO THE MAYOR, CITY COUNCIL, CITY CLERK, CITY TREASURER, AND RESIDENTS OF THE CITY OF CHICAGO:

The City of Chicago Office of Inspector General (OIG) has completed an audit of the Department of Streets and Sanitation's (DSS) enforcement of recycling requirements for commercial and high-density residential buildings (i.e., those with five or more units). The objective of the audit was to determine if DSS ensures that building owners are providing collection services required by the Chicago Recycling Ordinance. In addition, the audit evaluated DSS' enforcement of reporting requirements for the City's licensed private haulers—companies engaged in hauling refuse and recyclables from commercial and high-density residential buildings. The required annual reports identify a hauler's customers, catalog the total amounts and types of materials hauled, and specify which facilities received them.

Based on the audit results, OIG concluded that DSS does not ensure that commercial and high-density residential building owners provide recycling services. In addition, DSS does not ensure that private haulers submit complete, accurate, and timely reports detailing the buildings they served, and the amount and type of materials hauled. This data would be useful to the City for establishing recycling goals, monitoring progress towards these goals, and determining waste diversion rates. While recent changes in the global marketplace for recyclable materials have presented challenges for municipal programs, other cities are adapting rather than abandoning recycling altogether.

In response, DSS stated that it agrees with the recommendations and will begin to implement corrective actions. The Department is awaiting the results of a comprehensive waste study before moving forward with some of the recommendations.

We thank DSS staff and management for their cooperation.

Respectfully,

Joseph M Ferguson
Inspector General

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ACRONYMS

AIS	Department of Assets, Information and Services
BACP	Department of Business Affairs and Consumer Protection
DOE	Department of Environment
DSS	Department of Streets and Sanitation
MCC	Municipal Code of Chicago
MET	Mobile E-Ticket
MRF	Materials Recovery Facility
OIG	Office of Inspector General
VBWF	Volume-Based Waste Fee

CITY OF CHICAGO
OFFICE OF INSPECTOR GENERAL

DEPARTMENT OF STREETS AND SANITATION (DSS) COMMERCIAL AND HIGH-DENSITY RESIDENTIAL RECYCLING ENFORCEMENT AUDIT

Almost 500,000 Chicago households —more than 40%— are in buildings with five or more units.

Approximately 60,000 businesses are required to provide private hauling services for refuse and recyclables.

DSS does not thoroughly enforce the Chicago Recycling Ordinance.

DSS does not maintain a list of buildings required to procure private hauling services for recycling.

There is no option in the City's mobile e-ticket system to cite commercial and high-density residential building owners for failure to comply with the Chicago Recycling Ordinance.

DSS does not ensure that private haulers submit complete, accurate, and timely annual reports detailing the buildings they served, and the amount and type of materials hauled. DSS also cannot determine program outcomes and diversion rates.

I. EXECUTIVE SUMMARY

The Office of Inspector General (OIG) conducted an audit of the Department of Streets and Sanitation's (DSS) enforcement of recycling requirements for commercial and high-density residential buildings. Our objective was to determine if DSS ensures that building owners provide collection services required by the Chicago Recycling Ordinance.

The Chicago Recycling Ordinance (the Ordinance) states that owners or occupants of such buildings "shall contract with a private hauler, or cause a contract to be entered into with a private hauler, for the provision of source-separated recycling services [...]." The City is required to provide buildings found in violation of this requirement 30 days to come into compliance. Continued noncompliance can result in fines ranging between $500 and $5,000 per day. The Ordinance also requires private haulers to submit annual reports detailing the source, type, and amount of recyclables collected. This information would assist DSS in calculating waste diversion rates, setting goals, and monitoring progress toward those goals.

A. CONCLUSION

OIG concluded that DSS does not ensure commercial and high-density residential building owners provide the required recycling services. In addition, DSS does not ensure private haulers submit complete, accurate, and timely reports detailing the buildings they served, and the amount and type of materials hauled.

B. FINDINGS

DSS does not thoroughly enforce the Chicago Recycling Ordinance requiring commercial and high-density residential building owners to provide recycling services. In fact, the Department's Mobile E-Ticket (MET) citation system does not even allow users to issue citations for Ordinance violations. This creates a significant barrier to enforcement. Notably, when the former Department of Environment (DOE) was responsible for enforcing the Ordinance it was capable of issuing citations. The City disbanded DOE in 2011, however, and transferred responsibility for enforcement to DSS. The Department acknowledged that it has not met this responsibility, and has focused instead on operating the City's blue cart recycling program for residential buildings with one to four units

Although DSS does not maintain a list of high-density residential buildings, data from the Census Bureau's 2018 American Community Survey shows that nearly 500,000

Chicago households, about 41%, are in buildings with five or more units.[1] In addition, there are approximately 60,000 licensed businesses in Chicago that are required to procure private refuse and recycling hauling services.[2] Without enforcement of the Ordinance, many of these households and businesses may not be recycling.

OIG also found that DSS does not ensure private haulers submit complete, accurate, and timely annual reports detailing the buildings they served, and the amount and type of materials hauled. The Ordinance requires haulers to provide these reports by February 28th each year or risk fines. Furthermore, the Ordinance requires the DSS commissioner to "review and approve the adequacy" of each annual report submitted by a private hauler. In addition to citing haulers for submitting late or incomplete reports, the ordinance allows DSS to refer them to the Department of Business Affairs and Consumer Protection (BACP), which is authorized to withhold renewal of the hauler's business license until the hauler files a complete report.

In 2018, there were 15 licensed private waste haulers subject to the Ordinance's reporting requirements. Of the 15 required reports,[3] DSS,

- possessed nine, three of which were submitted after the February 28, 2019 deadline;
- obtained four upon OIG's October 2019 request; and
- did not possess or obtain two.

In addition, private haulers did not fully complete 5 of the 13 reports, thereby preventing DSS from calculating their waste diversion rates and including them in a citywide waste diversion rate.[4] Finally, DSS did not review the adequacy of the hauler reports or cite haulers for failure to submit timely and complete reports. The data in these reports could help DSS calculate diversion rates, set goals, and monitor progress toward those goals.

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[1] Chicago Metropolitan Agency for Planning, "Community Data Snapshot Chicago, Municipality June 2019 Release," June 2020, accessed August 6, 2020, https://www.cmap.illinois.gov/documents/10180/102881/Chicago.pdf.

[2] City of Chicago, Department of Business Affairs and Consumer Protection, "Statement from BACP Commissioner Rose Escareno," 2020 Budget Proposal to the City Council Committee on Budget and Government Operations, November 5, 2019, 3, accessed August 6, 2020, https://www.chicago.gov/content/dam/city/depts/obm/supp_info/2020Budget/OpeningStatements/BACPOpeningStatement.pdf.

[3] Appendix D contains an example of a hauler report.

[4] The waste diversion rate— the percentage of waste generated that is diverted from landfills by recycling, reuse, composting, and other diversion means—is a key performance indicator in any recycling program.

C. RECOMMENDATIONS

OIG recommends that DSS, working with the Department of Law (DOL) and the Department of Assets, Information and Services (AIS), if necessary, configure the MET system to allow users to issue citations for violations of the Ordinance. DSS should consistently record and monitor the outcomes of recycling inspections to determine, for example, whether building owners received 30-day notices and ultimately came into compliance or were issued citations. In coordination with the City's new chief sustainability officer, DSS should develop a program to enforce the Ordinance proactively, in addition to responding to complaints.

DSS should also ensure that haulers submit complete, accurate, and timely reports. As required by the Ordinance, DSS should review each annual report and notify BACP of noncompliant haulers. DSS should review the design of the annual reports to ensure it supports the City's recycling goals. The Department should also develop procedures to incorporate private haulers' diversion data into a citywide waste diversion rate. Finally, DSS should ensure that private haulers report all customers who decline recycling services and should consider requiring each hauler to submit a list of buildings it serves.

D. DSS RESPONSE

In response to our audit findings and recommendations, DSS stated that it agrees and will implement corrective actions. DSS has begun working with DOL and AIS to revise citation processes and add the ordinance to the MET system. The City has engaged a consultant to conduct a comprehensive waste study, and DSS will await the results before developing a proactive enforcement strategy. The waste study will also inform any changes to the design, collection, and usage of private hauler reports.

The specific recommendations related to each finding, and DSS' response, are described in the "Findings and Recommendations" section of this report.

II. BACKGROUND

A. RECYCLING IN CHICAGO

Chicago began administering recycling programs in the mid-1990s. Although the Municipal Code of Chicago (MCC) does not require the provision of garbage collection service to low-density residential buildings (four units or less), the City nevertheless performs this role. The City also collects recycling from such buildings, in keeping with MCC requirements.[5] In contrast, the MCC imposes both recycling and garbage collection requirements on commercial and high-density residential buildings, but the City does not provide those services.

1. The Blue Bag and Blue Cart Programs

The City has implemented a variety of programs for low-density residential building recycling. In 1995, the City rolled out its blue bag recycling initiative—a voluntary program where residents put their recyclables into blue bags that were placed in their garbage carts and later separated at City waste stations. However, the City struggled with low rates of participation in the program. In addition, the blue bags reportedly tore open and spilled in DSS trucks, and the process of separating them from garbage at waste stations was considered expensive and ineffective. The City discontinued the blue bag program in 2008.

The City initiated the blue cart program in seven communities in 2007 and expanded it citywide in 2013. This program, which is still in effect, relies on residents placing recyclable materials into separate blue containers and discarding other waste in black containers. The blue cart program is divided into six geographic zones. DSS services the blue carts in two zones and contractors service the remaining four.[6]

2. The Chicago Recycling Ordinance

The City's original legislation on this subject, the Workplace and Residential Recycling Ordinance, effective January 1, 1995, required all building owners and property managers of commercial and high-density residential buildings to establish recycling programs and procure private hauling services. However, according to DSS, that ordinance lacked clarity and required stronger enforcement provisions. Effective January 1, 2017, it was replaced by the Chicago Recycling Ordinance,[7] which was intended to remedy these problems and designates DSS as the enforcing department.

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[5] MCC § 11-4-1860

[6] City of Chicago Department of Streets and Sanitation, "Blue Cart Schedule and Maps," accessed August 17, 2020, https://www.chicago.gov/city/en/depts/streets/supp_info/recycling1/blue_cart_schedulesandmaps.html

[7] MCC § 11-5-010

The Ordinance requires commercial and high-density residential building owners to contract with private waste haulers for the provision of source-separated recycling services.[8] DSS is required to give noncompliant building owners 30-day notice to come into compliance, after which violators may be fined,

- between $500 and $1,000 per day for a first violation;
- between $1,000 and $2,500 per day for a second violation within one year; and
- between $2,500 and $5,000 per day for a third, and any subsequent, violation within one year of the most recent offense.[9]

Building owners are also required to furnish common areas with recycling containers "in an amount sufficient to enable persons occupying, using, visiting, or lawfully upon such premises to engage in source-separated recycling"[10] and to implement an ongoing education program to educate occupants about the recycling requirement.[11]

The Ordinance requires private haulers to, among other things,

- offer recycling services to their garbage collection customers and notify DSS within ten days of any customers who decline the offer;
- keep accurate and comprehensive records detailing the amount of recyclable materials collected annually and the facilities to which they delivered the materials;
- submit an annual report to DSS by February 28th every year, and including the following information on a form provided by DSS, with a certification that the information is complete and accurate:
    - the percentage of their customers that are residential, commercial, industrial, or institutional;
    - the type and tonnage of all recyclable material collected within the city during the reporting period and facilities to which it was delivered (by percentage);

[8] MCC § 11-5-030 Source-separated recycling is "a process that (1) separates recyclable material from waste, before the point of collection of such material, by requiring that recyclable material be placed in designated recycling containers, and (2) keeps recyclable material separate from waste until the recyclable material can be returned to the economic mainstream as new, used or reconstituted products." MCC § 11-5-020 Single stream recycling, a type of source-separated recycling where all recyclable materials are placed in the same container for collection, is permitted under MCC § 11-5-050
[9] MCC § 11-5-095
[10] MCC § 11-5-120
[11] MCC § 11-5-140 Appendix A provides more information on the ordinance requirements for building owners, private haulers, and DSS

- the same information as above for construction and demolition debris, and other waste, if applicable; and

- any other information the DSS commissioner requires.[12]

Private haulers that violate the Ordinance are subject to the same fine schedule as building owners.[13]

The DSS commissioner is required to review and approve each annual report submitted by a private hauler. If the commissioner notifies BACP of a late or incomplete report, the MCC provides that BACP shall not renew the hauler's business license until the DSS commissioner confirms that the hauler has filed a complete report.[14]

3. Additional Options to Encourage Recycling

At the outset of this audit, DSS and the Mayor's Office expressed interest in learning about other cities' attempts to increase recycling through minimum capacity requirements for recycling containers and volume-based waste fees. OIG researched these practices. The results of our research are provided in Appendices B and C, and summarized below.

(a) Minimum Capacity Requirements

The Ordinance does not require specific minimum container capacities or frequency of collection. For example, a high-rise building owner could technically comply with the Ordinance by providing tenants with a single 96-gallon blue cart—the size typically used for a single-family dwelling—emptied once every two weeks. Guidelines collected from various recycling organizations advise, however, that receptacles should allow 64 to 96 gallons *for every five units* within a building, assuming *weekly* pickup. We provide examples of multi-dwelling residential minimums in Appendix B.

(b) Volume-Based Waste Fee

Volume-based waste fee (VBWF) programs—also referred to as "pay as you throw"—require customers to pay for the amount of waste they discard rather paying than a flat fee, thus providing an incentive to recycle. This approach is akin to customers paying for the amount of electricity or natural gas they use. Hundreds of municipalities across the U.S. and throughout the world have implemented VBWF programs. We provide further information regarding VBFW programs in Appendix C

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[12] MCC § 11-5-220. Anyone who knowingly submits false material statements in this report is subject to prosecution under the City's False Statement Ordinance.
[13] MCC § 11-5-250
[14] MCC § 11-5-220(e)

B. RECYCLING KEEPS WASTE OUT OF LANDFILLS

The Illinois Environmental Protection Agency (IEPA) reported that, as of January 1, 2019, landfills in the Chicago metropolitan area had the capacity to receive trash for approximately 10 more years.[15] As shown in Figure 1, this is the shortest landfill life expectancy of IEPA's seven Illinois regions.

FIGURE 1: THE CHICAGO METROPOLITAN REGION LANDFILLS ARE PROJECTED TO FILL BEFORE ALL OTHER ILLINOIS REGION LANDFILLS

Region Number	Geographic Area	Number of Landfills	Life Expectancy as of January 1, 2019 (Years)
1	Northwestern Illinois	7	19.8
2	Chicago Metropolitan	4	10.2
3	Peoria/Quad Cities	7	29.7
4	East Central Illinois	7	27.3
5	West Central Illinois	4	14.8
6	St. Louis Metro East	4	22.7
7	Southern Illinois	5	48.5
Total		38	Average of 21.4

Source IEPA, Illinois Landfill Disposal Capacity Report, September 2019

Recycling reduces the amount of trash sent to landfills, thereby increasing their life expectancies. Recycling also reduces municipalities' dependence on landfills, thereby reducing the greenhouse gases that landfills emit.[16] Landfills are the third largest source of human-generated methane gas in the United States.[17] According to the Intergovernmental Panel on Climate Change, in conjunction with other potent greenhouse gases, human-generated methane harms our natural habitats and human health systems. The harm includes, but is not limited to,

- disruption of rural and urban economies;
- food and water scarcity;
- the increased spread of water and foodborne disease; and
- greater risk of injury and death associated with intensifying flooding, heat waves, and fires.

[15] Illinois Environmental Protection Agency, "Illinois Landfill Disposal Capacity Report," September 2019, 3, accessed August 6, 2020, https://www2.illinois.gov/epa/topics/waste-management/landfills/landfill-capacity/Documents/landfill-capacity-report-2019.pdf

[16] City of Chicago, "Recycling 101 An Introduction to Recycling," 2013, accessed August 6, 2020, https://www.chicago.gov/dam/city/depts/doe/general/RecyclingAndWasteMgmt_PDFs/MultiUnit/FactSheet_Recycling101.pdf

[17] United States Environmental Protection Agency, "Basic Information about Landfill Gas," 2020, accessed August 6, 2020, https://www.epa.gov/lmop/basic-information-about-landfill-gas

These harms are felt most acutely by underprivileged communities, regardless of their country's level of development.[18] Although recycling alone will not stop the harmful effects of climate change, it is an essential component of any climate change mitigation strategy.

C. CHANGES IN THE GLOBAL MARKETPLACE HAVE SIGNIFICANTLY AFFECTED U.S. RECYCLING

On January 1, 2018, China instituted the National Sword policy, effectively banning the import of all recyclable mixed plastic and mixed paper.[19] Soon thereafter, on March 1, 2018, China reduced the amount of impurities allowed within recyclable materials (the contamination level) to 0.5%. Later in 2018, China began enforcing tariffs on numerous recyclables, such as cardboard, plastics, and metals.

1. Impact of Chinese Policy Changes on United States Recycling

China's policy changes have significantly reduced the international market for recyclable materials, and the United States has struggled to adapt.[20] Materials recovery facilities (MRFs) that sort and prepare recyclables for the market have raised processing prices. Some MRFs have gone out of business. The rise in fees has increased costs for municipal curbside recycling programs, resulting in some programs being suspended or discontinued altogether.[21] Much of the United States' waste and recyclables have been diverted to other countries with less stringent regulations, such as Malaysia, Thailand, and Indonesia. However, these countries lack the capacity to process the amount of imported recycling previously processed in China, and they have also implemented restrictions on the import of foreign waste. Overall, the value of recyclables processed by MRFs in the U.S. declined by 48%, or $431 million dollars, between February 2017 and February 2019.[22]

2. Proactive Municipal Strategies

Although changes to the recycling market have created difficulties for municipalities, adaptive strategies are emerging. For example, MRFs have enhanced their processing

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[18] Intergovernmental Panel on Climate Change, "Climate Change 2014 Synthesis Report," 2015, 64, accessed August 6, 2020, https://www.ipcc.ch/site/assets/uploads/2018/02/SYR_AR5_FINAL_full.pdf

[19] Solid Waste Association of North America Applied Research Foundation, "Resetting Curbside Recycling Programs in the Wake of China," September 2019, 7

[20] Alex Truelove and Carrie Katan, "The State of Recycling In Illinois," U.S. PIRG Education Fund, November 14, 2019, 6, accessed August 6, 2020, https://illinoispirgedfund.org/sites/pirg/files/reports/The%20State%20of%20Recycling%20in%20Illinois%20%28Final%29.pdf

[21] Cole Rosengren, Max Witynski, Rina Li, F.A. Crunden, Cody Boteler and Katie Pyzyk, "How recycling has changed in all 50 states," Wastedive.com, November 15, 2019, accessed August 6, 2020, https://www.wastedive.com/news/what-chinese-import-policies-mean-for-all-50-states/510751/

[22] Solid Waste Association of North America Applied Research Foundation, "Resetting Curbside Recycling Programs in the Wake of China," September 2019, 13

procedures to match China's contamination standards, and cities have adjusted recycling fees to reflect the costs of hauling and processing. While this requires additional time and increases labor costs, recyclables retain a higher market value. According to a report by the National League of Cities, domestic recycling markets are beginning to expand; cities can facilitate this growth by employing such tactics as tax breaks for businesses utilizing recycled materials and municipal procurement practices that require purchasing recycled materials.[23]

Another strategy for responding to the new recycling market is modifying municipal contracts so that risk is shared more equitably between cities, haulers, and processers. In Palm Beach County, Florida, waste authorities reached a 12-month sales agreement with a paper mill that guarantees price minimums and maximums for the city's mixed paper. Similarly, San Antonio, Texas, entered into a contract with an MRF that charges more for accepting the city's materials than in the past but provides the city with a greater share of the revenue generated.

To increase recycling participation and reduce contamination, it is critical for municipalities to educate the public on these issues. Between 2016 and 2018, Elgin, Illinois, reduced its contamination rate from 40% to 16% with assistance from Waste Management's *Recycle Often, Recycle Right* educational toolkit. In Florida, the *Rethink. Reset. Recycle.* initiative provides educational resources for residents, public officials, and recycling advocates across the state. Other cities have used strategies such as utility bill inserts, social media outreach, and municipal websites to educate people on how to reduce contamination and maximize recycling.[24]

[23] Corinne Rico and Cooper Martin, "Rethinking Recycling: How Cities Can Adapt To Evolving Markets," 2018, 22-28, accessed August 6, 2020, https://www.nlc.org/sites/default/files/2018-09/CSAR_Recycling-MAG.pdf

[24] Corinne Rico and Cooper Martin, "Rethinking Recycling: How Cities Can Adapt To Evolving Markets," 2018, 16, accessed August 6, 2020, https://www.nlc.org/sites/default/files/2018-09/CSAR_Recycling-MAG.pdf

III. FINDINGS AND RECOMMENDATIONS

FINDING 1: DSS DOES NOT ENSURE THAT COMMERCIAL AND HIGH-DENSITY RESIDENTIAL BUILDING OWNERS PROVIDE RECYCLING SERVICES.

DSS does not actively enforce the Chicago Recycling Ordinance, requiring commercial and high-density residential building owners to provide recycling services. Notably, the Department's citation software does not allow users to issue citations for Ordinance violations. DSS acknowledged that it has not enforced the Ordinance, focusing instead on operating the City's blue cart recycling program.

DSS makes no attempt to identify noncompliant commercial or high-density residential buildings. However, it responds to public complaints about such buildings by sending ward superintendents to inspect them. OIG identified 97 complaint-based inspections conducted between January 1, 2017, and December 30, 2019. Of those, DSS issued 3 citations, 1 of which resulted in a fine of $290. But it is impossible to determine the significance of these numbers, because,

1. DSS does not maintain a list of buildings subject to the Ordinance or a list of customers served by private haulers (see Finding 2). Comparing these two lists could reveal buildings that do not provide recycling services
2. DSS does not consistently record the outcomes of inspections. It is not clear from the records if, for example, the ward superintendent found a building was in compliance, or delivered a notice to comply within 30 days and found it in compliance upon re-inspection, or closed a complaint for other reasons (such as an inability to contact the building owner).
3. The Mobile E-Ticket (MET) system ward superintendents use to issue citations does not include MCC § 11-5-030—the requirement to contract with a private hauler for recycling services—as a citable code section. Therefore, a ward superintendent seeking to cite a building owner for failure to provide recycling service must write the citation under a different provision. Each of the three citations OIG identified were cited under MCC § 7-28-220 ("Duty to provide refuse containers and service").[35]

[35] Based on the substance of the complaints that prompted the inspections, we are reasonably certain the citations were actually for failure to provide recycling services

The inability to issue a citation for failure to provide recycling services is a significant barrier to enforcement of the Ordinance. Notably, options for citing violations were available when the former DOE was responsible for enforcement. DOE was disbanded in 2011, however, and the responsibility was transferred to DSS.

Although DSS does not maintain a list of high-density residential buildings, data from the Census' 2018 American Community Survey shows that nearly 500,000 of Chicago households, about 41% of the total, are in buildings with five or more units.[26] Additionally, there are approximately 60,000 licensed businesses in the city that are required to procure private refuse and recycling hauling services.[27] Without enforcement of the Ordinance, many of these households and businesses may not be recycling.

RECOMMENDATIONS

1. DSS, working with the Department of Law and the Department of Assets, Information and Services if necessary, should configure the MET system to allow users to issue citations for violations of the Ordinance.
2. DSS should consistently record and monitor the outcomes of recycling inspections to determine, for example, whether building owners received 30-day notices and ultimately came into compliance or were issued citations.
3. In coordination with the City's new chief sustainability officer, DSS should develop a proactive approach to enforcing the Ordinance, in addition to responding to complaints. An effective approach will likely require DSS to,
    (a) create and maintain a complete and accurate list of buildings subject to the ordinance, as well as their compliance status. This may require the assistance of other City departments (e.g., Law, Buildings, and Planning and Development);
    (b) set goals for number and frequency of inspections and measure the Department's performance against those goals;
    (c) develop a random or risk-based method of selecting which buildings to inspect; and

[26] Chicago Metropolitan Agency for Planning, "Community Data Snapshot Chicago, Municipality June 2019 Release," June 2020, accessed August 6, 2020, https://www.cmap.illinois.gov/documents/10180/102881/Chicago.pdf.

[27] City of Chicago, Department of Business Affairs and Consumer Protection, "Statement from BACP Commissioner Rose Escareno," 2020 Budget Proposal to the City Council Committee on Budget and Government Operations, November 5, 2019, 3, accessed August 6, 2020, https://www.chicago.gov/content/dam/city/depts/obm/supp_info/2020Budget/OpeningStatements/BACPOpeningStatement.pdf.

(d) define a standardized inspection process for determining compliance with all provisions of the Ordinance, including an owner's duty to implement an education program informing occupants about their building's recycling service.[28]

MANAGEMENT RESPONSE

1. *"We have begun the discussion with the Department of Law (DOL) and AIS about revising the process for proper citing of the violation, including adding the ordinance to the MET system."*

2. *"DSS currently tracks all complaints/inspection requests and tracks the outcomes in the CSR/Salesforce system. In March 2020, DSS began discussions with DOL to update our inspection, compliance, and outcome tracking process."*

3. *"DSS worked with the Mayor's Office Policy and Sustainability group to engage a consultant to conduct a comprehensive waste study, which includes issues of private waste & recycling collection. As part of this study, a full assessment of the City's private waste regulation is being conducted. This study will inform the direction and goals that need to be set in order to improve the waste diversion for the City and region.*

   Specifically, the scope of the study will include a review of the waste & recycling policies, contracts, data, and infrastructure. And, develop and prioritize strategies for waste reduction, recycling and reuse. The information and recommendations from the study will inform the development of a proactive approach to enforcement of the Ordinance and to achieving the underlying goals of the Ordinance. The recommendations provided in the OIG's report will be taken into consideration together with the waste study findings to form a comprehensive strategy going forward."

[28] See Appendix A for a summary of other provisions of the Ordinance

FINDING 2: DSS DOES NOT ENSURE THAT PRIVATE HAULERS SUBMIT COMPLETE, ACCURATE, AND TIMELY ANNUAL REPORTS DETAILING THE BUILDINGS THEY SERVED, AND THE AMOUNT AND TYPE OF MATERIALS HAULED. DSS ALSO CANNOT DETERMINE PROGRAM OUTCOMES AND DIVERSION RATES.

DSS does not ensure that private haulers submit complete, accurate, and timely annual reports detailing the buildings they served, and the amount and type of materials hauled. The Ordinance requires haulers to provide these reports by February 28th of each year or risk a fine. Furthermore, MCC § 11-5-220(e) requires the DSS commissioner to "review and approve the adequacy" of each report submitted by a private hauler. In addition to citing haulers for submitting late or incomplete reports, the Ordinance allows DSS to refer them to BACP, which is required to withhold renewal of the hauler's business license,until they file a complete report.

In 2018, there were 15 licensed private waste haulers subject to the reporting requirements. Of the 15 required reports,[29] DSS,

- possessed nine, three of which were submitted after the February 28, 2019 deadline;
- obtained four upon OIG's October 2019 request; and
- did not possess or obtain two.

In addition, private haulers did not fully complete 5 of the 13 reports, thereby preventing DSS from calculating their waste diversion rates and including them in a citywide waste diversion rate.[30] Finally, DSS did not review the adequacy of the hauler reports or cite haulers for failure to submit timely and complete reports. The data in these reports could help DSS calculate diversion rates, set goals, and monitor progress toward those goals.[31]

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[29] See Appendix D for an example of a hauler report.

[30] The waste diversion rate— the percentage of waste generated that is diverted from landfills by recycling, reuse, composting, and other diversion means—is a key performance indicator in any recycling program.

[31] DSS last reported diversion rates in July 2018. Those rates, however, were based solely on the Blue Cart Recycling Program. City of Chicago Department of Streets and Sanitation, "About Blue Cart Recycling

The Ordinance also requires private haulers to offer services to their garbage collection customers and to notify DSS of any customers who decline the offer. Private haulers have not reported such customers to DSS, though this information would help DSS enforce compliance. While not required by the Ordinance, private haulers could also provide a list of buildings served to further inform DSS efforts to ensure compliance.

RECOMMENDATIONS

4. DSS should ensure that private haulers submit complete, accurate, and timely annual reports. As required by the Ordinance, DSS should review each report and notify BACP of noncompliant haulers.
5. DSS should review the design of the annual reports to ensure it supports the City's recycling goals. Such review efforts would include,
   a. determining data collection goals and conclusions to be drawn from the reports; and
   b. ensuring the reports are designed to accurately capture the data necessary to evaluate the goals and make conclusions.
6. DSS should develop procedures to incorporate elements of private haulers' diversion rates into a citywide waste diversion rate.
7. DSS should ensure that private haulers report customers who decline recycling services and consider requiring each private hauler to submit a list of buildings served.

MANAGEMENT RESPONSE

4. *"DSS understands the importance of these reports and the obligation to continue to collect the information under the MCC. DSS will utilize BACP's two-year renewal process to ensure the hauler reports are submitted as required by the MCC BACP may withhold the issuance or renewal of a license to haulers that fail to submit a report. The reporting process and other regulatory measures for private waste haulers are being assessed as part of our waste study."*
5. *"These reports are being assessed as part of our waste study & review process and may be re-designed based on specific recommendations of the waste study."*

2018 Results," accessed September 17, 2020, https://www.chicago.gov/city/en/depts/streets/supp_info/recycling1/about_blue_cart_recycling.html

6. *"This is a part of the comprehensive waste study, and a course of action will be developed taking into consideration the recommendations in the OIG's report upon receipt of the study."*
7. *"This is a part of the comprehensive waste study, and a course of action will be developed taking into consideration the recommendations in the OIG's report upon receipt of the study."*

IV. OBJECTIVES, SCOPE, AND METHODOLOGY

A. OBJECTIVE

The objective of the audit was to determine if DSS ensures commercial and high-density residential building owners provide recycling services, as required by the Chicago Recycling Ordinance.

B. SCOPE

This audit focused on DSS' current enforcement processes, or lack thereof, related to recycling at commercial and high-density residential buildings. The Ordinance defines high-density residential buildings as those having five or more dwelling units. Regarding DSS' complaint-based enforcement, OIG considered service requests from June 2, 2018 to November 26, 2019.

C. METHODOLOGY

To gain an understanding of DSS' current enforcement activities and internal controls, OIG interviewed DSS management and ward superintendents. We learned that DSS did not thoroughly enforce the Ordinance, but relied solely on complaint-based inspections conducted by ward supervisors. We assessed control environment, control activities, information and communication, and monitoring activities with the understanding that there is no active enforcement of the Ordinance, based on interviews with DSS management.

To determine the effectiveness of DSS' complaint-based inspection process, OIG reviewed Salesforce[32] service request data. Because there is no request specific to recycling at commercial or high-density residential buildings, we reviewed all requests related to recycling and attempted to decipher from the content whether the request was related to our objective. Specifically, we generated a report of service requests that identified buildings with five dwelling units or more. Finally, we compared these requests to City citation data, including citations under MCC § 7-28-220, which ward superintendents stated they used as a proxy for violations of the Ordinance.

To determine if DSS collected private hauler reports, OIG requested the 15 reports from 2018 as required by MCC § 11-5-220. We evaluated the available reports for the timeliness of their submission, completeness, and utility of their data.

[32] Salesforce is the software that captures identifying characteristics of 311 service requests

D. STANDARDS

We conducted this audit in accordance with generally accepted Government Auditing Standards issued by the Comptroller General of the United States. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

E. AUTHORITY AND ROLE

The authority to perform this audit is established in the City of Chicago Municipal Code § 2-56-030 which states that OIG has the power and duty to review the programs of City government in order to identify any inefficiencies, waste, and potential for misconduct, and to promote economy, efficiency, effectiveness, and integrity in the administration of City programs and operations.

The role of OIG is to review City operations and make recommendations for improvement.

City management is responsible for establishing and maintaining processes to ensure that City programs operate economically, efficiently, effectively, and with integrity.

APPENDIX A: CHICAGO RECYCLING ORDINANCE

The following tables summarize the major responsibilities of building owners, private haulers, and DSS under the Chicago Recycling Ordinance, MCC Chapter 11-5.

Commercial and high-density residential building owners are required to:

- contract with private waste haulers for the provision of source-separated recycling services[33] in addition to garbage collection;
- furnish common areas with recycling containers "in an amount sufficient to enable persons occupying, using, visiting, or lawfully upon such premises to engage in source-separated recycling;" the containers must,
  - "(1) be clearly identified as recycling containers;
  - (2) display a written and/or pictorial list of the recyclable material that may be deposited into such a container;
  - (3) be emptied on a regular basis so that continued and uninterrupted source-separated recycling is able to occur on the premises; and
  - (4) be maintained free from odor;"[34]
- post permanent, legible signs in common areas informing people that the Chicago Recycling Ordinance requires source-separated recycling;
- post permanent, legible signs in maintenance areas listing all materials required to be source-separated and how those materials are collected;
- implement an ongoing education program to educate occupants about the recycling service; the program must include flyers with the following information:
  - types of materials that must be recycled
  - types of materials that may not be placed in a recycling container
  - how to properly prepare items for recycling
  - the interior and exterior locations of recycling containers
  - the collection schedule
  - the name and contact information of the private hauler; and
- provide written notice to occupants of any change to the recycling service within ten days of the change.

Private haulers are required to, among other things:

- inform their customers in writing of the ordinance requiring source-separated recycling, and which materials must be recycled;
- offer to provide recycling services to their garbage collection customers, and notify DSS within ten days of any customers who decline the offer;
- provide their customers with legally accessible recycling containers that are:
  - a shade of blue that is clearly distinguishable from the garbage containers, and clearly marked as recycling containers;

[33] MCC § 11-5-030 Source-separated recycling is "a process that (1) separates recyclable material from waste, before the point of collection of such material, by requiring that recyclable material be placed in designated recycling containers; and (2) keeps recyclable material separate from waste until the recyclable material can be returned to the economic mainstream as new, used or reconstituted products." MCC § 11-5-020 Single stream recycling, a type of source-separated recycling where all recyclable materials are placed in the same container for collection, is permitted under MCC § 11-5-050

[34] MCC § 11-5-120

  - made of leak- and rodent-proof rigid material with a close-fitting lid;
  - display a list or illustration of recyclable materials that may be deposited in the container,
  - display the name and contact information of the private hauler, and the address or business name of the customer;
- provide their customers with written instruction manuals that include:
  - "(1) the definition of source-separated recycling;
  - (2) why it is important to recycle;
  - (3) the list of material accepted and specifically prohibited for recycling [...],
  - (4) how to prepare recyclable material for handling by the hauler;
  - (5) how to prevent contamination of recyclable material; and
  - (6) the address of the Department's City of Chicago website, where this ordinance shall be posted and where additional information about disposal, reuse and recycling options can be obtained."[35]
- keep accurate and comprehensive records detailing the amount of materials collected from customers annually and the facilities to which they deliver the materials;
- retain those records for at least three years and make them available upon request by the City
- by February 28th every year, submit an annual report to DSS including the following information, on a form provided by DSS:
  - percentage of customers that are residential, commercial, industrial, or institutional;
  - type and tonnage of all recyclable material collected within the city during the reporting period, and facilities to which it was delivered, by percentage;
  - the same information as above for construction and demolition debris, and other waste, if applicable,
  - any other information the DSS commissioner requires; and
- certify that the information in the annual report is complete and accurate.[36]

DSS is required to enforce the ordinance generally, and specifically to:

- give noncompliant building owners 30 days' notice to come into compliance;
- "review and approve the adequacy" of each annual report submitted by private haulers; if the DSS commissioner notifies the Department of Business Affairs and Consumer Protection (BACP) of any late or incomplete reports, BACP must not renew the hauler's business license until the commissioner confirms that the hauler has filed a complete report
- fine violators:
  - between $500 and $1,000 for a first violation,
  - between $1,000 and $2,500 for a second violation within one year, and
  - between $2,500 and $5,000 for a third, and any subsequent, violation within one year of the most recent offense.[37]

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[35] MCC § 11-5-240(a)

[36] Anyone who knowingly submits false material statements is subject to prosecution under the City's False Statement Ordinance. MCC Chapter 1-21. MCC § 11-5-270 (c)

[37] These fines apply to building owners and to private haulers. The ordinance also specifies that "each day a violation continues shall constitute a separate and distinct offense." MCC §§ 11-5-050 and -250

APPENDIX B: MINIMUM CAPACITY REQUIREMENTS

OIG identified organizational guidelines for determining the appropriate volume and number of recycling containers relative to the number of occupants or residential units. The organizations include StopWaste, Recycling Partnership, and Zero Waste Design, as shown in Figure 2. Additionally, OIG identified guidelines determined by certain municipalities across the U.S. and Canada, as shown in Figure 3.

FIGURE 2: ORGANIZATIONAL GUIDELINES

Source	Volume	Per Unit/Person	Frequency
StopWaste[38]	50 gallons	Every 3 People	Weekly
Recycling Partnership[39]	96 gallons	Every 5 Units	Weekly
Zero Waste Design Guidelines[40]	64 gallons	Every 5 Units	Weekly

FIGURE 3: MUNICIPAL GUIDELINES

Municipality	Volume	Per Unit/Person	Frequency
Chula Vista, CA	34-40 gallons	1 unit	Weekly
Columbus, OH	64 gallons	1 unit	Bi-weekly
Half Moon Bay, CA	1 cubic yard (200 gal)	16 units	N/A
Louisville, KY	25 gallons	1 unit/ 3 people	Weekly
Seattle, WA	1.5 cubic yards (302 gal)	10 units	Weekly
Sunnyvale, CA	192 gallons	10 units	Weekly
Toronto, CAN	8 cubic yards (1,536 gal)	100 units	Weekly

[38] Stopwaste, "Space Guidelines for Recycling, Organics, and Refuse Services for Designers of Multifamily and Commercial Buildings," 2020, accessed August 6, 2020, http://www.stopwaste.org/sites/default/files/Building-Guidelines-Final-Apr8.pdf

[39] The Recycling Partnership, "A Guide To Implementing A Cart-Based Recycling Program," 2015, accessed August 6, 2020, https://recyclingpartnership.org/wp-content/uploads/2018/05/implementing-carts-guide.pdf

[40] Zero Waste Design Guidelines, "Waste Calculator," 2020, accessed August 6, 2020, https://www.zerowastedesign.org/waste-calculator/

APPENDIX C: VOLUME-BASED WASTE FEE

Volume-based waste fee (VBWF) programs offer a more equitable distribution of costs to those who use refuse collection and disposal services the most. They provide financial incentives to reduce waste generation, as well as a greater awareness of an individual's responsibility to reduce waste and increase recycling. These programs may not necessarily cause people to generate less waste, but may incentivize people to divert more of their waste. There is also potential to financially burden low-income residents or large families, which may then create an incentive to illegally dump waste. Administering VBWF programs in multi-unit buildings can be more challenging than doing so in single family homes, and depending on the type of VBWF program enacted, there may be substantial start-up costs.[41]

FIGURE 4: VBWF PROGRAM TYPES[42]

Program Type	Description
Bag Programs	Customers purchase bags imprinted with special logos ahead of time, and waste must be put in the appropriate bag (yard waste, recyclables, garbage, etc.). The price of the bag incorporates the cost of collection, transport, and disposal of the waste. In some communities however, the cost of the bag only reflects a portion of the cost.
Hybrid Programs	Adds an incentive-based system to fixed fee systems by reducing service under existing fixed fee system and if a customer needs to dispose of additional waste, there is an additional charge such as a fee per bag or additional container
One-Can Customers	Some communities have introduced mini-can (13-20 gallons) or micro-can (10 gallons) garbage service levels to provide incentives for aggressive recyclers.
Tag and Sticker Programs	Identical to bag programs, except instead of using a special bag, customers affix an appropriate sticker or tag that identifies the type of waste they are disposing.
Variable Can or Subscribed Can	Customers select the appropriate number or size of containers for their standard weekly garbage disposal amount. Higher rates correspond with increases in the number or size of carts selected.
Weight-Based Programs	Waste trucks weigh garbage containers and charge customers based on the actual weight of garbage set out for disposal. On-

[41] "Advancing Sustainable Materials Management: 2017 Fact Sheet," United States Environmental Protection Agency, November 2019. https://www.epa.gov/sites/production/files/2019-11/documents/2017_facts_and_figures_fact_sheet_final.pdf

[42] "Recycling in Michigan: Successful Recycling Programs, Best Practices, and Diversion Potential," Northeast Michigan Council of Governments, January 2016. https://www.michigan.gov/documents/deq/450735_14_NEMCOG_FINAL_RECYCLING_REPORT_519916_7.PDF

	board computers record weights by household and customers are billed on this basis
Other Variations	Waste drop-off programs that use customer tracking systems.

FIGURE 5: EXAMPLES OF VBWF PROGRAMS ACROSS THE U.S.

Municipality	Program Type	Program Description
Austin, TX[43]	Variable Can or Subscribed Can, Tag and Sticker Program	Residents are charged a base fee of $14 70 per month plus a per gallon fee that is dependent on the size cart they choose Total costs for collection of refuse, recycling, bulk, brush, and yard trimmings are included. • $0.16 per gallon for 64-gallon or smaller carts • $0.30 per gallon for 96-gallon carts Austin also offers collection of extra bags of trash that do not fit in a resident's cart Extra bags must be tagged with an extra trash sticker which cost $4 plus tax each
Fort Worth, TX[44]	Variable Can or Subscribed Can, Bag Program	Residents are charged monthly for refuse based on the size cart they choose Each cart size has a garbage collection weight limit as well. Recycling is provided at no additional charge • $12 05 per month for 32-gallon cart (150 lb limit) • $17 05 per month for 64-gallon cart (200 lb limit) • $22.75 per month for 96-gallon cart (250 lb limit) If residents exceed their limit, residents can purchase bags that can be set aside their carts for collection Those are $15 for a set of five
Grand Rapids, MI[45]	Variable Can or Subscribed Can	Residents are charged for waste per tip,[46] and the fee per tip varies depending on the size cart they choose Recycling is provided at no additional charge • $3 05 per tip for 32-gallon cart • $5 10 per tip for 64-gallon cart • $7 15 per tip for 96-gallon cart Grand Rapids equips refuse and recycling carts with radio frequency identification tags and collection vehicles are equipped with onboard reader systems The carts are linked to each residents' address allowing for refuse and recycling data collection and the transfer of operational data back to the office using the onboard systems
Minneapolis, MN[47]	Variable Can or	Residents are charged a monthly refuse fee of $25 08 (per dwelling unit) They are then charged an additional fee per month based on the

[43] "Residential service rates and fees," austintexas gov, 2020 http://www austintexas gov/department/residential-services-rates-and-fees

[44] "Garbage Collection Fees," fortworthtexas gov, 2020 https://fortworthtexas gov/solidwaste/fees/

[45] "Waste Service Payments," City of Grand Rapids, 2020 https://www grandrapidsmi gov/Payments/Waste-Service-Payments

[46] A "tip" refers to the act of emptying one container—in this case "tipping" the container into a truck to remove its contents

[47] "2016 Minneapolis Residential Solid Waste Composition Analysis And Recycling Program Evaluation Final Report," Hennepin County, 2016 https://www hennepin us/-/media/hennepinus/your-government/projects-initiatives/documents/hennepin-county-waste-sort-study-2016 pdf?la=en&hash=7C290E8FC7C10B0BD89D3495A9B714C06A702CF1

	Subscribed Can	size container they choose Recycling is provided at no additional charge. • $2 00 per month for 32-gallon size • $5 00 per month for 96-gallon size There is no additional fee for recycling carts
Sacramento, CA[48]	Variable Can or Subscribed Can	Residents are charged for both waste, recycling and yard waste pickup based on the size and number of carts they choose for each service Waste Collection • $14 35 per month for 32-gallon cart, any additional cart of this size is $14 20 per month • $18 90 per month for 64-gallon cart, any additional cart of this size is $16 44 per month • $23.00 per month for 96-gallon cart, any additional cart of this size is $19 43 per month Recycling • $5 90 per month for 64-gallon cart or 96-gallon cart, any additional cart of any size is $2 03 per month Yard Waste • $10 75 per month for 96-gallon cart, any additional cart is $3 49 per month
San Jose, CA[49]	Variable Can or Subscribed Can, Tag and Sticker Program	Residents are charged for garbage collection based on the size cart they choose These fees include recycling service • $35 89 per month for 32-gallon cart • $71 78 per month for 64-gallon cart • $107 67 per month for 96-gallon cart If any additional waste collection is needed, residents can purchase extra bag stickers San Jose also explicitly outlines a VBWF program for high-density buildings. The city offers 1, 1 5, 2, 3, 4, 5, 6, and 8 cubic yard size containers and offers up to 5 collections per week Prices are dependent on the size container and the number of collections per week requested
Seattle, WA[50]	Variable Can or Subscribed Can, Bag Program	Residents are charged for waste collection based on the size container they choose and where the container is located (curb or alley vs backyard) There is no additional cost for recycling services • 12-gallon cart $24 25 per month for curb or alley pickup, backyard pickup N/A • 20-gallon cart $29 70 per month for curb or alley pickup, backyard pickup N/A • 32-gallon cart $38 65 per month for curb or alley pickup, $54 00 per month for backyard pickup • 64-gallon cart $77 25 per month for curb or alley pickup, $108 20 per month for backyard pickup

[48] "Curbs de Collection Services," City of Sacramento, 2020 https://www.cityofsacramento.org/Public-Works/RSW/Collection-Services

[49] "Recycle Plus Service & Rates," sanjoseca gov, 2020 https://www.sanjoseca.gov/home/showdocument?id=40068

[50] "Garbage Can Rates," Seattle gov 2020 https://www.seattle.gov/utilities/services/rates/garbage-rates

		• 96-gallon cart $115.90 per month for curb or alley pickup, $162.25 per month for backyard pickup • Extra waste pickup is also available at a fee of $12.00 per bundle

APPENDIX D: RECYCLING HAULER/CENTER REPORT

The following is 1 of the 13 reports submitted to DSS with identifying information redacted.

RECYCLING HAULER/CENTER REPORT

DEPARTMENT OF STREETS AND SANITATION

AS REQUIRED UNDER THE PROVISIONS OF THE CHICAGO RESIDENTIAL AND COMMERCIAL RECYCLING ORDINANCE (MCC 11-5-210 and 11-5-220): Private haulers shall maintain complete and accurate records containing the following information: (1) the total tonnage of recyclable material collected by the private hauler from the totality of the private hauler's refuse collection customers within the city during each calendar year; (2) the name and address of each facility to which the private hauler delivered any percentage of such collected recyclable material during each calendar year; (3) the percentage of recyclable material delivered each calendar year by the private hauler to each facility identified pursuant to item (2) above; and (4) any other information that the Commissioner may require in duly promulgated rules. The records required under MCC 11-5-210 and 11-5-220 shall be kept on file by the private hauler for a period of three years.

Any recycling hauler operating within the boundaries of the City of Chicago shall submit an annual Recycling *Hauler Report to the Department of Streets and Sanitation.* This report must be completed and submitted in its entirety. If further space is required, please include, as needed, additional sheets as attachments to this Form.

Hauler/Center Name: [redacted]

Hauler/Center Address: [redacted]

Name of Contact Person(s) Responsible for responding to Departmental Inquiries ("Responsible Contact Person"): [redacted]

Responsible Contact Person(s) Telephone Number: [redacted]

Responsible Contact Person(s) E-mail Address: [redacted]

Percentage of Private Hauler's Customers that are:

5 **Residential** 60 **Commercial** 30 **Industrial** 1 **Institutional** 4 **Establishments**

Reporting Period: January 1 - December 31 (Due Feb 28) 2018 Year

Materials Collected by Category	Quantity	
(1) Recyclables (Not including materials listed below)	600	tons — all delivered to [redacted]
(2) Yard Waste		tons
(3) Food Scraps		tons
(4) Electronics		tons
(5) White Goods		tons
(6) Construction and Demolition Debris	388	tons
(7) Other		tons

50% to [redacted]

50% [redacted]

Percentage of Recyclable Materials Collected per Facility

Name of Facility	Category 1	Category 2	Category 3	Category 4	Category 5	Category 6	Category 7

Approximate Percentage of Construction and Demolition Debris Collected and the Receiving Facility

Name of Receiving Facility	Brick	Soil	Rock	Wood	Wall Coverings	Plaster

Name of Receiving Facility	Drywall	Plumbing Fixtures	Non-Asbestos Insulation	Roofing Shingles and Other Roof Coverings	Reclaimed Asphalt Pavement	Glass

Name of Receiving Facility	Plastics	Electric Wiring	Piping	Stone	Concrete	Other

Approximate Percentage of Waste delivered to Each Facility

Facility Name	Percentage	Tons
1.		
2.		
3.		
4.		
5.		
6.		
7.		
8.		
9.		
10.		

Certification

As an authorized representative ("Representative") of the company named below, I hereby certify that I have personally examined and am familiar with the information submitted in this Report; and that, based on my inquiry of those individuals immediately responsible for obtaining that information, I believe, to the best of my knowledge, that all of the information submitted herein is true, accurate and complete.

Representative's Name: [redacted]

Representative's Title: [redacted]

Company Name: [redacted]

Representative's Mailing Address: [redacted]

Representative's Phone Number: [redacted]

Representative's Fax Number: _____

Representative's E-mail Address: [redacted]

Representative's Signature: [redacted] Date: [redacted]

Submit this Form by mail OR electronically by e-mail to:

City of Chicago Department of Streets and Sanitation

121 N. LaSalle/ Room 1107

Chicago, IL 60602

Or

Email: DSSRecycling@cityofchicago.org

For further questions and information, please contact:

Recycling Office

Department of Streets and Sanitation

Recycling Office: 312.744.2413

Email: DSSRecycling@cityofchicago.org

MISSION

The City of Chicago Office of Inspector General (OIG) is an independent, nonpartisan oversight agency whose mission is to promote economy, efficiency, effectiveness, and integrity in the administration of programs and operations of City government. OIG achieves this mission through,

- administrative and criminal investigations by its Investigations Section;
- performance audits of City programs and operations by its Audit and Program Review Section;
- inspections, evaluations and reviews of City police and police accountability programs, operations, and policies by its Public Safety Section; and
- compliance audit and monitoring of City hiring and human resources activities and issues of equity, inclusion and diversity by its Diversity, Equity, Inclusion, and Compliance Section.

From these activities, OIG issues reports of findings and disciplinary and other recommendations,

- to assure that City officials, employees, and vendors are held accountable for violations of laws and policies;
- to improve the efficiency and cost-effectiveness of government operations; and
- to prevent, detect, identify, expose, and eliminate waste, inefficiency, misconduct, fraud, corruption, and abuse of public authority and resources.

AUTHORITY

OIG's authority to produce reports of its findings and recommendations is established in the City of Chicago Municipal Code §§ 2-56-030(d), -035(c), -110, -230, and 240.

Cover image courtesy of OIG

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