



COLORADO

Department of Public Health & Environment

2017 Annual Report to the Colorado General Assembly:

**Status of the Solid Waste Management Program
In Colorado**

Submitted to the Colorado General Assembly
by the Hazardous Materials and Waste Management Division
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Subject: The report describes the status of the Solid Waste and Materials Management Program and efforts to implement the program at the lowest possible cost without jeopardizing the statutory intent.

Statute: Section 30-20-101.5(3), C.R.S.

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2017 Annual Report to the Colorado General Assembly: Status of the Solid Waste Management Program In Colorado

INTRODUCTION

Colorado’s Solid Waste Management Program is responsible for ensuring compliance with laws and regulations pertaining to the management of solid waste. The authority for this program is in the Colorado Solid Waste Act, 30-20-100.5, *et seq.*, C.R.S. The U.S. Environmental Protection Agency (EPA) has approved Colorado’s solid waste management program. With that approval, the authority to implement requirements for management of solid waste in Colorado rests completely with the state.

Primary elements of the Solid Waste Management Program (the program) include compliance assistance, compliance monitoring and enforcement, permitting, and materials management and recycling. Each of these program elements is discussed in the following sections.

The Solid Waste Management Program currently regulates the following facilities:

Facility Type	Number of Facilities
Landfills	80
MSW Landfills	58
Construction and demolition debris (C&D) Landfills	7
Waste Tire Monofills	3
Coal Combustion Ash Monofills	8
Other Landfills (special wastes, landfarms)	4
Closed Landfills in post-closure care	133
Composting Facilities	36
Incinerators	4
Recycling Facilities	163
Medical Waste Facilities	3
Transfer Stations	59
Solid Waste Impoundment Facilities	60
Commercial Expl and Production Waste Impoundments	12
Waste Tire Facilities	3,043
Waste Grease Facilities	64

Colorado law, at 30-20-101.5(3) and 30-20-122, C.R.S., requires an annual report to the General Assembly be submitted on Feb. 1 of each year. This report must describe the status of the Solid Waste Management Program and the efforts of the Colorado Department of Public Health and Environment to carry out its statutory

responsibilities at the lowest possible cost without jeopardizing the intent of the statute. This report is intended to satisfy that statutory requirement.

ACCOMPLISHMENTS

Compliance Assistance

A goal of the Solid Waste Management Program is for all regulated facilities to be in, and stay in, compliance with state law and the regulations. The traditional inspection and enforcement program serves as one primary mechanism for reaching that goal. However, compliance assistance is another important method for obtaining and maintaining compliance. The General Assembly recognized the value and importance of compliance assistance in that one of the expectations set out in Section 30-20-101.5(2)(f), C.R.S., is for the department to “establish a preference for compliance assistance with at least 10 percent of the annual budget amount being allocated to compliance assistance efforts.” In FY 2017, the program met that requirement with 14.4 percent of staff time devoted to compliance assistance.

The program has developed and continues to invest in a broad range of compliance assistance services to help the regulated community manage hazardous waste appropriately. These compliance assistance services include the following activities:

- A part-time customer assistance and technical assistance phone line (303-692-3320): This telephone line is staffed four hours/day during business hours to provide information on common waste management questions and more complex or detailed regulatory guidance. Through this phone line, program technical assistance staff responded directly to 629 solid waste calls and 81 emails during FY 2017.
- A wide range of solid waste guidance documents and compliance bulletins and an extensive, useful and informative Website, which can be found at www.colorado.gov/pacific/cdphe/hm. The division maintains an extensive set of guidance information for regulated entities through both print and electronic media. During FY 2017, the Solid Waste Management webpage received 9,790 hits. The “exit rate” for these hits is low - 18%, which means that most visitors to the website found something of interest or value and clicked through to subsequent pages.
- Periodic solid waste management training sessions provided to industry by our staff and solid waste training requested by industry groups and others: In FY 2017, the division provided 28 compliance-assistance training sessions to industry around the state and reached about 893 people. The training sessions focused on solid waste and related environmental regulations. These trainings included presentations by program and local agency staff.
- Program inspectors routinely incorporate compliance assistance and pollution prevention into the compliance inspections performed each year. In the past year, program staff have delivered compliance assistance on 159 of the 409 inspections performed, or on 39% of inspections.

Compliance Monitoring and Enforcement

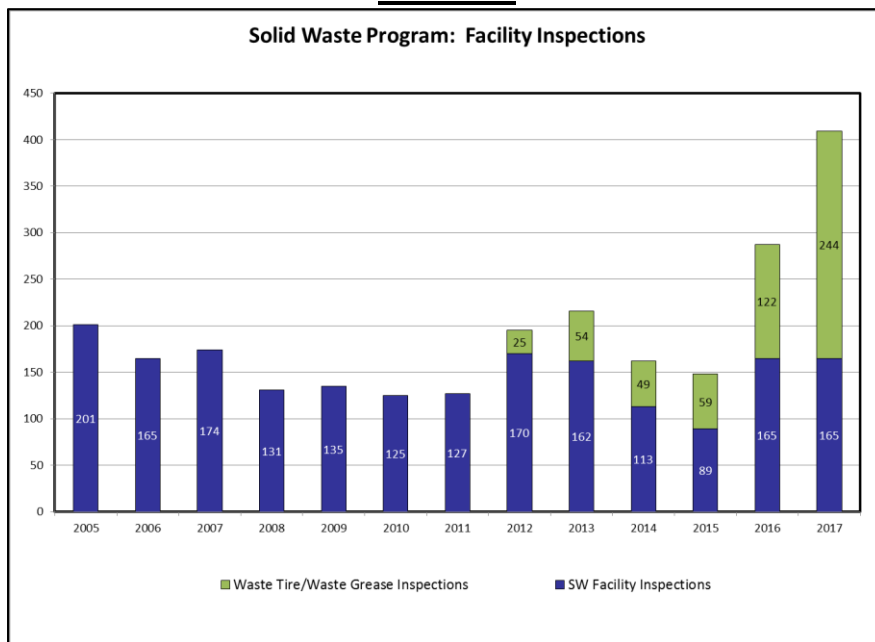
Table 1 presents the numbers and types of inspections performed by, and for, the program.

TABLE 1

Facility Type	Number of Inspections
Landfills	74
Composting Facilities	5
Medical Waste Facilities	5
Commercial Expl and Production Waste Impoundments	6
Recycling Facilities	26
Asbestos in soil sites	17
Beneficial Use sites	5
Illegal Disposal Sites	17
Remediation sites	2
Transfer Stations	2
Surface Impoundment Facilities	2
C&D Disposal Facilities	2
Other types of Facilities	2
Subtotal	165
Waste Tire Facilities	241
Waste Grease Facilities	3
Total - Inspections performed by Program Staff	409
Waste Tire Facilities inspected by local governments	346

The 409 inspections performed by program staff is further presented on Figure 1 along with comparison to previous years. In 2014 and 2015, the program was understaffed, but 2016 and 2017 represent a significant increase in inspections from any previous years. The performance plans for each inspector define the number of completed inspections needed to achieve an outstanding, satisfactory or unsatisfactory performance rating. In 2017, each inspector performed about 46 inspections.

FIGURE 1

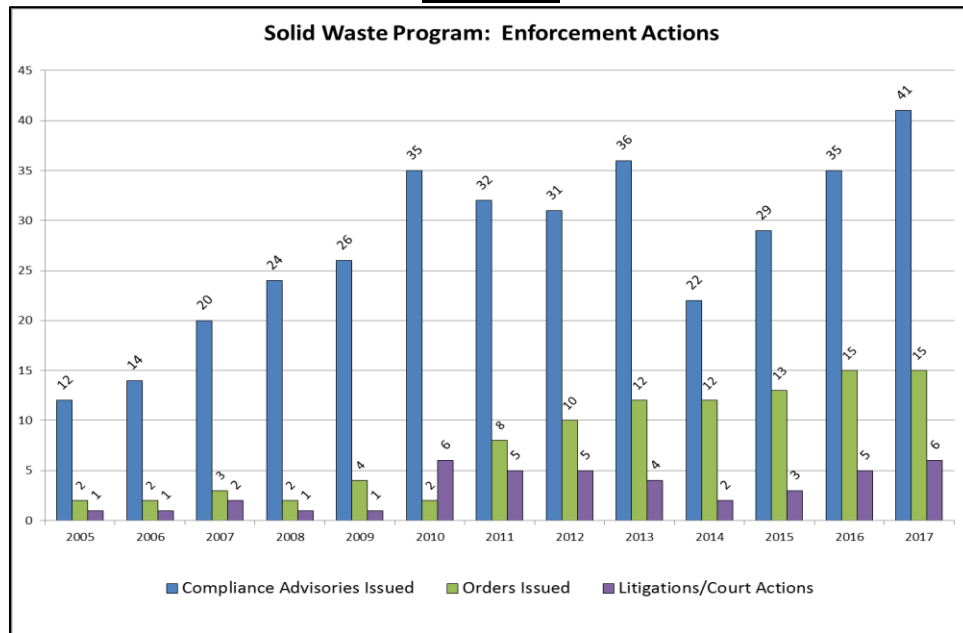


Every inspection carries administrative responsibilities, such as advance planning and preparation, inspection report preparation, tracking return-to-compliance activities at the facility, tracking and preparing needed enforcement documents, and data entry.

The program puts a high priority on complaints and spill reports. In FY 2017, the program received 52 complaints. Of those, 24 were investigated and/or inspected by our staff and 28 were referred to local governments or other agencies. In addition, 92 spill reports were received. We followed-up on 81 of those spills to ensure appropriate cleanup actions were completed, and the remainder were referred to local governments or other agencies.

Inspections, complaints, and spill follow-up result in the issuance of formal and informal enforcement actions. Informal actions are called Compliance Advisories, and formal actions include Compliance Orders and civil actions filed in court. Figure 2 on the next page presents the number of formal and informal enforcement actions undertaken.

FIGURE 2



Referring to Figure 2 above, Compliance Advisories were issued within the Program’s 90-day guideline 96% of the time, and 62% of Compliance Orders were issued within the Program’s 300-day guideline. Of the 15 Compliance Orders shown for 2017 on Figure 2, eight of the Orders assessed a total of \$198,816 payable to the Colorado General Fund. The remaining Orders assessed no penalties.

HB07-1288 requires that the program’s inspections “focus on major violations of regulations that pose an immediate and significant threat to human health and the environment.” We will be able to demonstrate how we have accomplished this requirement in next year’s report.

Small Landfill Compliance Initiative

For some time, we have known that the big landfills in Colorado are largely very compliant, but small landfills have significant compliance problems. Interestingly, most of the large landfills are operated by large national waste management companies, and the smaller landfills tend to be operated by local governments. The following table illustrates these points.

TABLE 2

Municipal Solid Waste Landfill Category	# in category	# with compliance problems in 2016	Public/Private Operator
Small (< 7300 tons/year)	19	17 89%	19 Public 95% 1 Private 5%
Medium (7300 < x < 140,000 tons/year)	28	4 14%	20 Public 71% 8 Private 29%
Large (> 140,000 tons/year)	12	0 0%	2 Public 17% 10 Private 83%
Total	60	21 35%	41 Public 68% 19 Private 32%

To address the compliance problems at the small landfills, which are all located in rural parts of the state, the program has started the Small Landfill Compliance Initiative. We have met with all communities operating small landfills and let them know the current compliance status of their landfill and the approximate cost for getting their landfill into compliance. We also asked them to make a decision on whether they will upgrade their landfill to a compliant status or close their landfill. To date, 15 of the 19 small landfills in Colorado have elected to continue operations and four have elected to close. In the 2017 legislative session, the Program was awarded \$1.3 million in general fund money to be combined with \$0.3 million of Program money to help close the small landfills that want to close and to install ground water monitoring systems at the small landfills that want to stay open. Landfill closures and well installations will occur in 2018.

Of the 15 small landfills that want to continue to operate, compliance has already improved at eight. Program staff are continuing to follow-up on all outstanding compliance issues at these facilities.

Permitting

In Colorado, all solid waste disposal sites and facilities need Certificates of Designation (CDs) issued by the local government. These are facilities at which the deposit and final treatment of solid waste occurs and includes landfills, incinerators, medical waste treatment facilities, and certain subsets of waste impoundments and composting facilities. However, it does not include recycling facilities, transfer stations, and any facility disposing of their own solid waste generated on their own site.

In order to get a CD, a facility must submit their application to the local government. The local government then refers the application to the program for a technical review to be sure that the facility can operate safely and in a manner that protects human health and the environment. If the division recommends approval of the application, the local government evaluates whether the proposed facility conforms to the local land use plan and zoning restrictions. The local government may approve or disapprove of the application at that point. However, if the division recommends disapproval, then the local government must disapprove the application.

The portion of the application that the program reviews is called the Engineering Design and Operations Plan (EDOP). Certain facilities that do not require a CD must still get an approved EDOP. Therefore, the division's "permitted universe" includes all solid waste facilities with EDOPs. Table 2 on the next page summarizes this universe of facilities.

TABLE 3

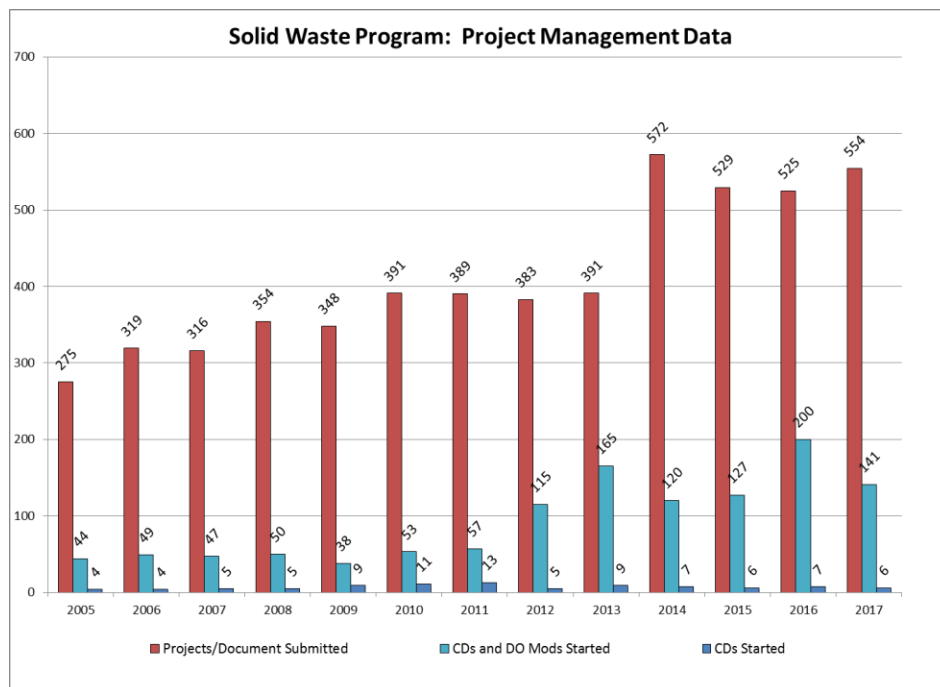
Solid Waste Facilities with Engineering Design and Operations Plans (EDOPs)			
Facility Type	# with CDs	# with EDOPs	Total
Landfills	80	80	80
Composting Facilities	7 ⁽¹⁾	11 ⁽¹⁾	18 ⁽¹⁾
Recycling Facilities	0	7 ⁽²⁾	7 ⁽²⁾
Medical Waste Facilities	3	3	3
Solid Waste Impoundments	15	60	60
Other Facilities (waste-to-energy, animal disposal)	2	6	6
Totals	107	167	174

(1) Does not include 8 composting sites co-located at permitted landfills

(2) Does not include 5 recycling sites co-located at permitted landfills

This large universe of sites with EDOPs is not static. New facilities are being built and existing facilities are adding new solid waste management units, adding waste streams, and adding treatment capabilities - all of which needed EDOPs or EDOP modifications to be reviewed and approved. Figure 3 presents the large number of documents being submitted to our staff by this universe of facilities on an annual basis, from 2005 to 2017.

FIGURE 3



This graph does not show the relative complexity of these documents. The Program now differentiates documents submitted by regulated entities for our review and approval into three categories: projects of high, medium and low complexity. While the CD application category is by definition a major project of high complexity, EDOP modifications, for example, can vary from major to moderate to even minor on the

complexity scale - ground water monitoring reports can be relatively simple, but engineering designs for new treatment technologies and new landfill cells with sophisticated liners and caps can be very complex.

To show our efforts on documents of different complexities, please refer to Figures 4, 5 and 6. These graphs compare SFY2016 with SFY2017 for three measures - the number of days it took for us to begin our review (days in backlog), the number of days it took us to finish our review, and the number of billable hours we charged to the customer for our review. Figure 4 shows that we have improved the backlog for high complexity documents in SFY2017, but the backlogs for medium and low complexity documents remain high. Figure 5 shows that the number of days that elapse during our review has stayed relatively constant. The best news is that Figure 6 demonstrates that despite long backlogs and review durations, the actual number of billable hours we spend on documents is relatively low and going lower. This points to staff performing efficient and effective reviews.

FIGURE 4

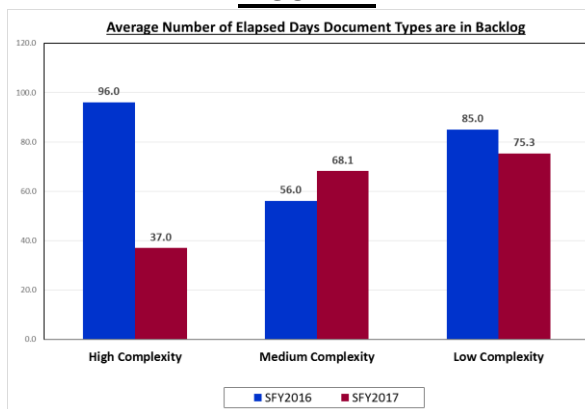


FIGURE 5

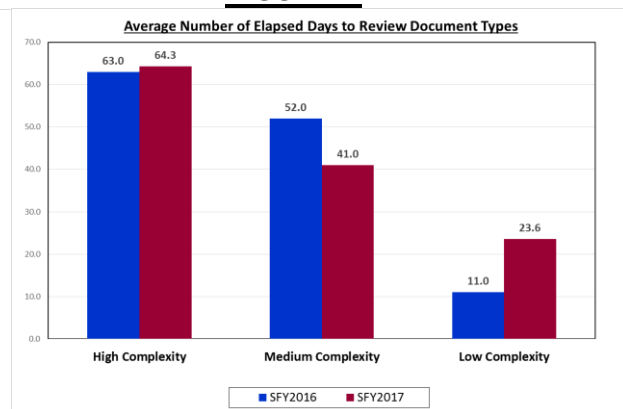
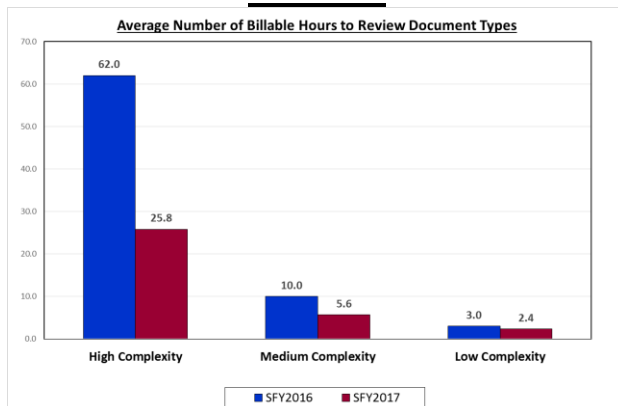


FIGURE 6



Materials Management & Recycling

Within the Program, there are several materials management and recycling programs:

1. Waste tire program,
2. Waste grease program,
3. Beneficial use program,

4. Paint stewardship program, and
5. Recycling and waste diversion analysis for Colorado.

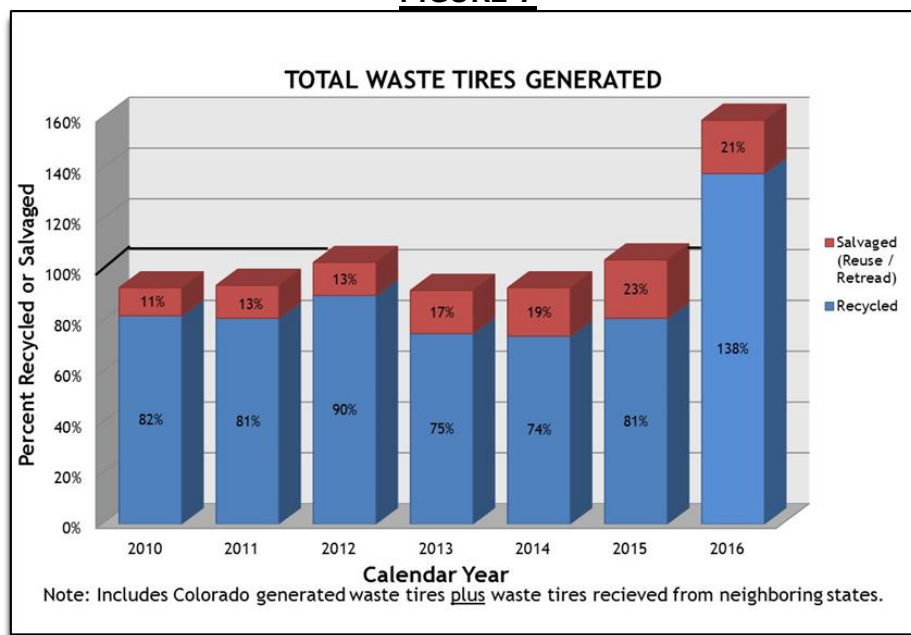
Waste Tire Program

Over the past decade, the waste tire program has expanded to become fully integrated from oversight of waste tire generators (commercial tire shops), haulers, processors, collection facilities, end users, and monofills. Program staff inspect facilities, ensure collection of the waste tire fee on each newly purchased tire, and award grants and rebates to entities that use tire-derived products.

During calendar year 2017, waste tire staff conducted 198 waste tire inspections and compliance assistance visits. Additionally, the program issued 11 compliance advisories (informal enforcement actions) and 2 Compliance Orders (formal enforcement actions) for the non-compliance with waste tire laws and regulations.

In calendar year 2017, 10 local health agencies participated in the Waste Tire Inspection grant program, in which local governments conducted waste tire inspections on behalf of the department. Local partners conducted 870 inspections and technical assistance visits in 2017. The majority of these inspections and visits were of waste tire generators (e.g., retail tire shops), but many waste tire haulers and illegal waste tire sites were also evaluated.

FIGURE 7



Some of the more significant metrics tracked for the waste tire program include Figures 7, 8, and 9. Figure 7 shows that in 2016 (2017 data has not yet been tabulated), 159% of waste tires generated in, or imported into, Colorado were either recycled or re-used. Figure 8 illustrates the top 10 uses of waste tires with alternative daily cover and tire-derived fuel being the top two uses. Figure 9 shows that, since 2011, Colorado has been recycling or salvaging more than 100% of the

waste tires generated in Colorado. For a complete explanation of the waste tire programs, please see the 2016 Annual Report to the Colorado legislature located at:

https://www.colorado.gov/pacific/sites/default/files/HM_SWReports_2016-Tire-Recycling-Annual-Rpt_FINAL_063017.pdf

FIGURE 8

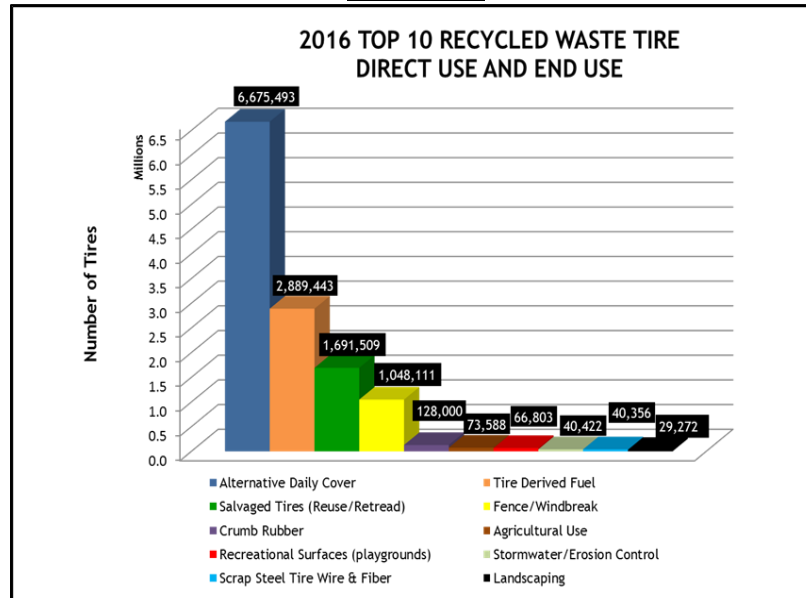
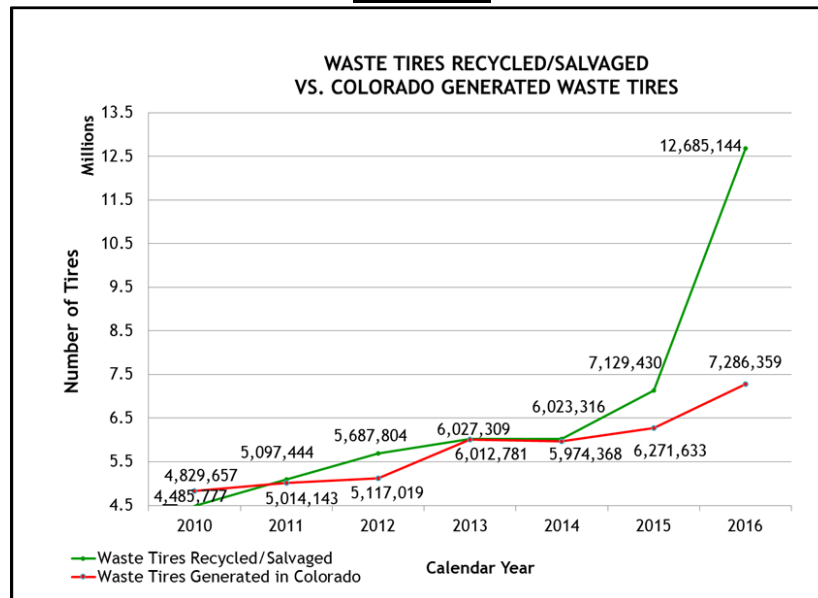


FIGURE 9



Waste Grease Program

A total of 57 waste grease transporters and 15 waste grease facilities were registered with the division at the end of CY 2017. Waste grease program staff performed 5 waste grease transporter and facility compliance inspections and compliance assistance site visits in FY 2017. During these inspections, staff provided educational

information, answered questions and concerns about the waste grease program and evaluated each operator's compliance status.

Staff continues to process new waste grease registration applications and annual waste grease renewal applications and provide information about the waste grease program by answering and responding to waste grease phone calls and emails.

Beneficial Use Applications

“Beneficial Use” of solid waste is the re-use of waste materials as a substitute for a new material. Examples include the re-use of slightly contaminated soil on construction sites, the use of wastewaters for irrigation or dust suppression, and the use of old asphalt or concrete in road base or other construction applications. The materials management group reviewed 22 beneficial use applications in FY 2017, resulting in 228,109 tons of solid waste and 91,210,858 gallons of water diverted from traditional disposal when combined with past beneficial use approvals.

Paint Stewardship

In June of 2015, CDPHE's Executive Director approved the Architectural Paint Stewardship Program Plan for the State of Colorado. PaintCare Inc., a non-profit stewardship organization created by paint manufacturers, drafted the Plan as a result of the Architectural Paint Stewardship Act (Section 25-17-4, C.R.S). The Plan provides a) a description of the fees PaintCare will assess on the sale of new architectural paint to help manage unwanted paint and b) a description of how PaintCare will satisfy the legislative requirements for convenience of paint drop-off locations, number of paint drop-off locations in highly populated areas and methods for collecting paint in less densely populated areas.

PaintCare contracts with various waste haulers, local household hazardous waste facilities and paint recyclers to arrange the processing of unwanted paint. While PaintCare does not actually process any paint, they are responsible for ensuring that paint recycling and disposal is convenient and free for residents.

PaintCare is responsible for reporting by March 31 each year on their performance for the previous calendar year. The CDPHE Solid Waste Program also drafts a report to the legislature annually that summarizes PaintCare's performance. The 2016 PaintCare report provides the following highlights: In 2016, PaintCare processed 672,029 gallons of unwanted or unusable paint; 75% of the paint collected was latex paint and 25% was oil based paint; and 81% of the latex paint collected was either beneficially used or recycled.

The Architectural Paint Stewardship Program Plan, the 2016 PaintCare annual report and the solid waste and materials management program's paint stewardship reports all offer much more detail and can be found here:

<https://www.colorado.gov/pacific/cdphe/paint-stewardship>

Recycling and Materials Diversion Tracking

In August of 2017, the Colorado Solid and Hazardous Waste Commission established municipal solid waste diversion goals for the next 20 years at state-wide and regional levels. The waste diversion goals, presented below in Table 4, set a realistic but ambitious objective for Colorado to approach the national average for waste diversion in ten years by reaching a diversion rate of 35% for municipal solid waste (MSW) and then stretching to a 45% diversion rate by 2036. Adopting waste diversion goals was the top recommendation for improving recycling and composting in the Integrated Solid Waste and Material Management Plan and was widely supported by stakeholders. The newly approved 20 year waste diversion goals also fulfill the statutory requirement of the Program to set long term goals on waste diversion.

TABLE 4

Colorado Municipal Solid Waste Diversion Goals				
Diversion Goals	2016	2021	2026	2036
Front Range	NA	32%	39%	51%
Greater Colorado	NA	10%	13%	15%
Statewide	19%	28%	35%	45%

The program tracks many aspects of recycling and waste diversion. For instance, Figures 10 through 13 below show the overall waste generation and waste diversion metrics through 2016, the last year information is available. Figure 10 presents the overall generation, disposal and diversion of solid waste. Waste is either disposed of in Colorado’s landfills (Total Solid Waste Disposed) or diverted to recycling facilities, composting facilities or utilized for beneficial reuse (Industrial Material Diverted and MSW Diversion). Waste disposal continues to increase but industrial material diversion also increased in 2016.

FIGURE 10



Figure 11 presents the diversion rate of MSW as a percent of the total waste generated. “Diversion” means that the waste was recycled or beneficially re-used, but not placed in to a landfill. A 19% diversion rate for Colorado puts the state below the national average of 34%. While this diversion rate appears low, current reporting does not allow for direct and accurate comparison of MSW diversion rates to MSW disposal rates. The Program is currently in the process of revising the methods for collecting disposal data by creating separate reporting categories for MSW and industrial waste on landfill reporting forms. Tracking MSW disposal separate from industrial waste disposal will allow the Program to improve the accuracy of data on the Colorado’s MSW diversion rate. This improved data will be available for calendar year 2018.

Figure 11 shows a decrease in the amount of solid waste that is diverted and recycled from 2014 to 2016. This is true in Colorado and across the nation. According to industry analysts, as long as energy prices remain depressed, the recycling industry and recycled materials commodity prices will probably remain depressed as well. This happens because manufacturers benefit from reduced energy consumption and lower costs of raw materials versus recycled materials. The program believes the recycling market will continue to be depressed until energy prices increase and global demand for hard goods increases to pre-recession levels.

FIGURE 11

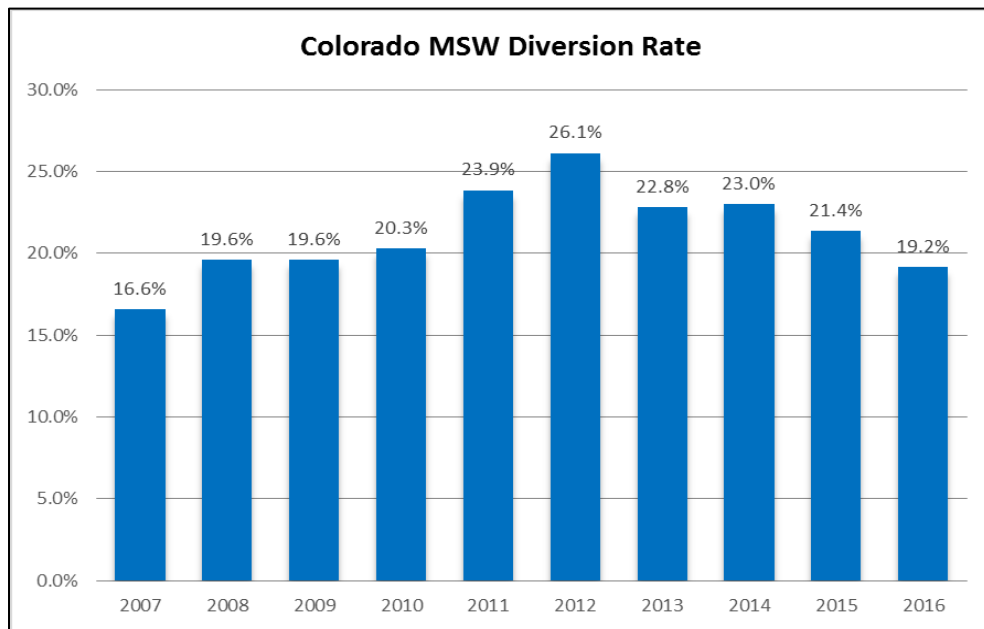


Figure 12 represents the average amount of waste generated in pounds per person per day. At more than 9 pounds/person/day, Colorado generates more than most states.

FIGURE 12

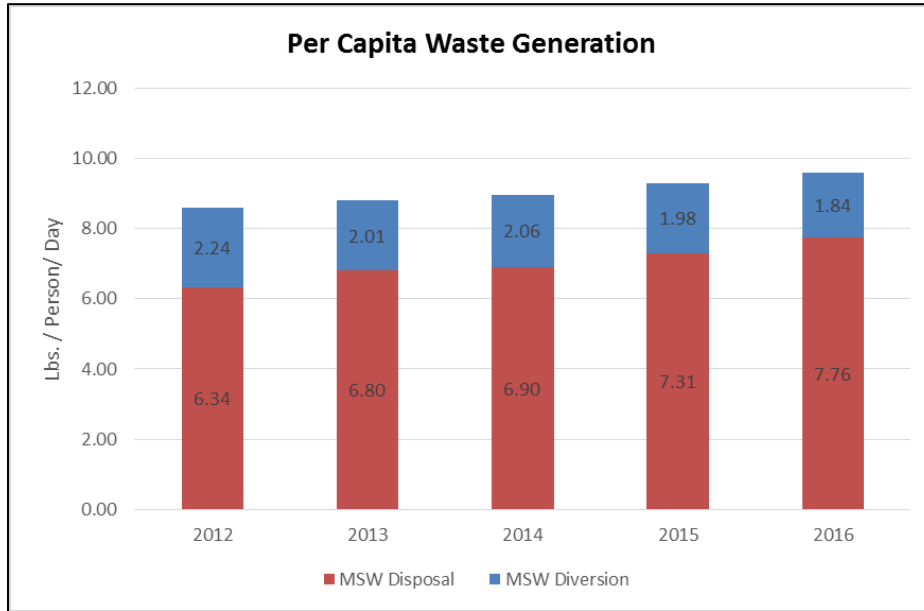


Figure 13 shows the overall content of diverted materials by weight for 2016. Clearly, organic materials including paper, cardboard, and compostable materials ran well ahead of all other recyclables like aluminum, glass and plastic. Again, these figures do not include scrap metal, cement, asphalt, or waste tires.

FIGURE 13

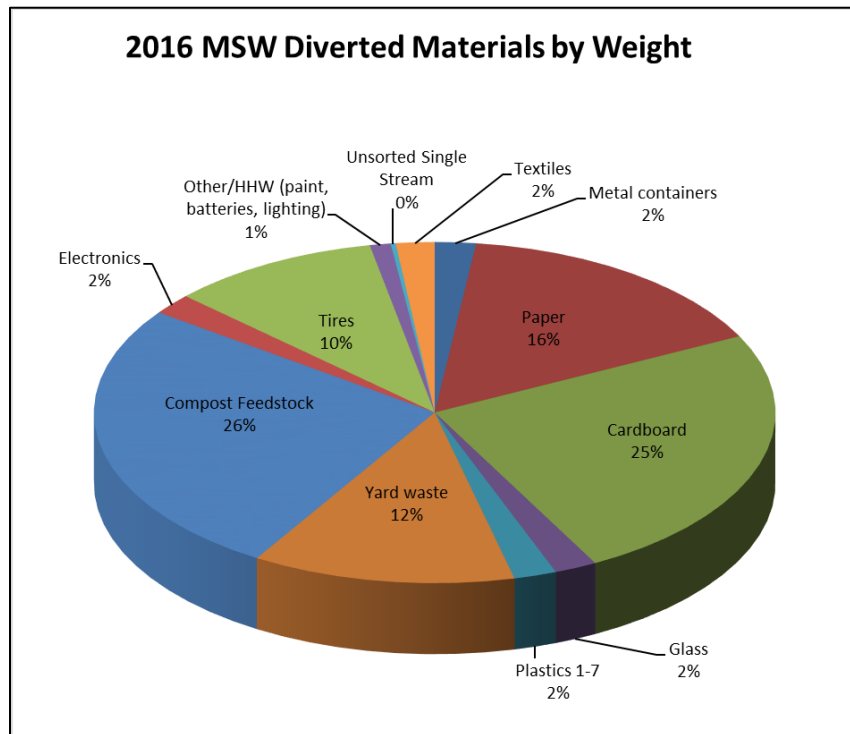


Table 5 shows the annual change in the quantity of municipal solid waste materials recycled for each type of material. This material-specific data shows that, while the total annual diversion rate percentage decreased from 2015 to 2016 (Figure 8), the total weight of MSW diverted improved by 15% from the prior year. The amount of cardboard, glass, tires, HHW/paint and textiles diverted all increased. The amount of metals, plastics, electronics and unsorted recyclables decreased. The decline in metals is probably not real because a large metal recycler changed ownership and did not collect data to report. Electronics recycling likely decreased due to a declining amount of heavy CRT monitors and televisions being collected for recycling. Plastics recycling may have declined because of the drop in commodity market value for oil-derived plastics and decreasing demand from traditionally strong export markets overseas. The drop in unsorted and mixed recyclables dropped due to a major recycler changing their processing operations to single stream recyclables rather than exporting mixed recyclables out of state.

TABLE 5

Material Recycled	2015 (tons)	2016 (tons)	% Change
Metal (containers)	35,213	21,455	-39.1%
Paper	174,079	172,765	-0.8%
Cardboard	224,431	270,831	20.7%
Glass	20,332	22,241	9.4%
Plastics (1-7)	24,547	22,296	-9.2%
Yard waste	135,741	137,640	1.4%
Compost Feedstock	257,678	289,195	12.2%
Electronics	23,819	21,727	-8.8%
Tires	46,308	110,178	137.9%
Other/HHW (paint)	8,067	10,922	35.4%
Unsorted Recycling	4,847	2,577	-46.8%
Textiles	1,940	20,217	942.1%
TOTAL	959,017	1,104,059	15.1%

Program Funding

Funding for the Colorado Solid Waste Management Program comes entirely from fees. The program receives no Colorado General Fund money. The program’s fee support has five components: 1) the Solid Waste User Fee (SWUF) which is a fee based on the weight or volume of waste disposed of at a landfill, also known as a “tipping fee,” 2) the Hourly Activity Fee assessed for prescribed services rendered to facilities, 3) the Annual Facility Fee which is an annual fee remitted by facilities that are not required to pay the SWUF, 4) the Waste Grease Annual fee charged to all registered waste grease facilities, and 5) the PaintCare program fee which is a flat fee paid by the PaintCare implementing contractor. In FY 2017, the SWUF provided about 84% of the program’s funding needs with the other fees covering the remaining 16%.

FIGURE 14

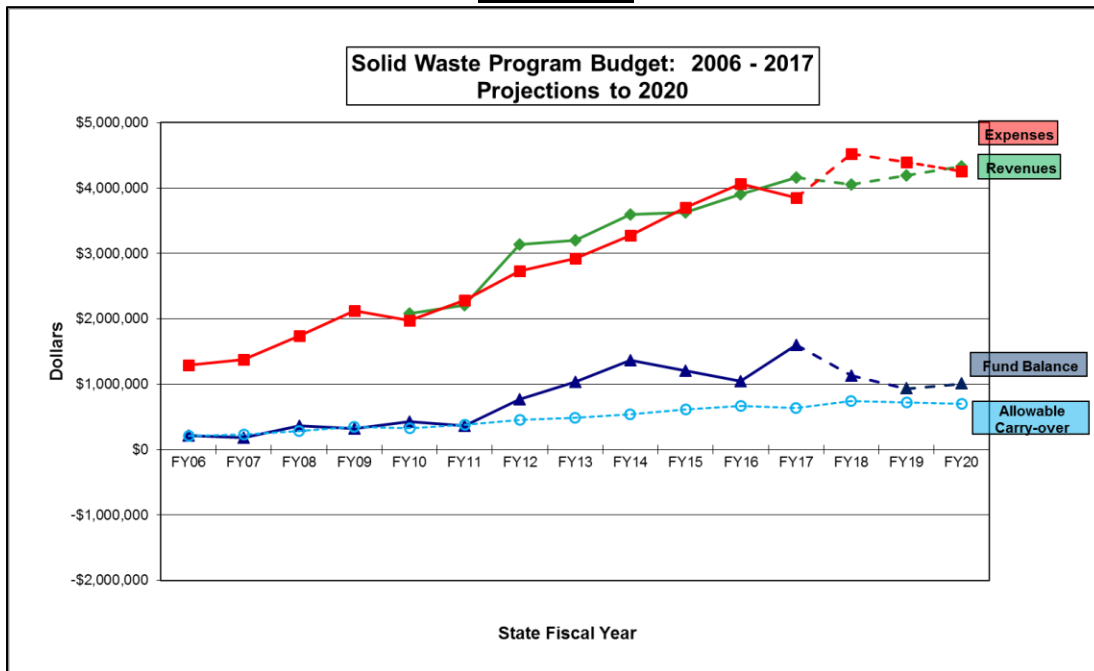


Figure 12, above, tracks the revenue, expenditures and fund balance for the Solid Waste Program. This graph shows that, if our projections are correct, we will have adequate revenues to fund the program at least through FY 2020 at the current fee levels. Figure 12 also shows that the program is striving to balance revenues and expenditures and bring the fund balance to allowable levels.

It is important to note that staff salaries are the biggest single expense item for the program. Therefore, managing staffing levels is an important part of managing the program's budget. Even though it has been around for a long time, the Solid Waste Program is not a mature program. Over the past 8 years, we have seen a lot of program growth, both in terms of the programs we administer and the staff needed to implement those programs. Some of this is the result of a growing, changing and demanding solid waste industry. Other growth can be directly attributed to legislative action that added to our responsibilities. This growth can be seen on Figure 12 starting in FY 2007 and continuing through FY 2016, where expenses increased significantly as staffing was added to meet workload demands. We believe we are now fully staffed. However, in 2018, we will be adding one temporary FTE to oversee the \$1.6 million ground water monitoring well installation program (a 2017 decision item) at small landfills. In addition, we may be adding another FTE in 2018 to oversee an old closed landfill compliance assistance initiative.

HB 07-1288 Summary of Requirements

The division's successes in maintaining efficiency are clearly presented in this report. Significant improvement has occurred and is continuing to occur in an effort to further improve efficiency and reduce costs.

The following table presents a summary of the requirements of HB 07-1288 and the program's efforts and activities to comply with each requirement. This table is intended to augment, but not replace, the presentation of information earlier in this report.

HB07-1288 Statutory Requirement - Referenced section of the Colorado Revised Statutes (CRS)	Solid Waste Management Program Response
30-20-101.5(1)(a) Promote community ethic to reduce or eliminate waste problems.	The program has worked hard on three fronts to accomplish this requirement: 1) our staff make working with, and cooperating with, local governments a high priority; 2) the program places a high priority on investigating citizen complaints; and 3) the program makes itself available through the technical assistance telephone line and technical trainings provided around the state.
30-20-101.5(1)(b) Is credible and accountable to industry and the public	The program endeavors to maintain credibility and accountability through 1) a high-volume, high-efficiency prioritized inspection program that maintains compliance and a level playing field; and 2) a high-efficiency permitting program that meets or exceeds its commitments to the regulated community.
30-20-101.5(1)(c) Is innovative and cost-effective	This report presents the program's progress and accomplishments in becoming cost-effective and efficient. It also presents our commitment to, and implementation of, innovative approaches.
30-20-101.5(1)(d) Protects the environmental quality of life for impacted residents per the regulations	Our success in this requirement can be ascertained by considering our success in all of the other aspects of the program.
30-20-101.5(2) Develop, implement and continuously improve policies and procedures for statutory responsibilities at lowest possible costs.	After HB07-1288 passed, the program set up numerous performance goals. This report presents our success in meeting those goals.
30-20-101.5(2)(a) Establish cost-effective level-of-effort guidelines for reviewing submittals, including permit applications and design and operations plans, considering the degree of risk addressed and the complexity of the issues raised.	The program is actively developing these level-of-effort guidelines and will have them in place and functioning by FY 2017.
30-20-101.5(2)(b) Establish cost-effective level-of-effort guidelines for performing inspections that focus on major violations of regulatory requirements that pose immediate and significant threat to human health and the environment.	The program has included goals in each inspector's performance plan for the number of inspections expected and for the timeliness of administrative duties associated with each inspection. In addition, the program is developing reporting capabilities for focusing on major violations and requirements that pose a threat to human health and the environment.
30-20-101.5(2)(c) Establish cost-effective level-of-effort guidelines for enforcement activities.	The program has significantly improved the efficiency and cost-effectiveness of enforcement activities over the last several years and we operate under timeliness guidelines established in the program's Enforcement Response Policy. However, because of the importance of quality workmanship in enforcement actions, and because each action is very site- and violation-

HB07-1288 Statutory Requirement - Referenced section of the Colorado Revised Statutes (CRS)	Solid Waste Management Program Response
	dependent, the program has not established firm level-of-effort guidelines. To meet our timeliness goals, though, the level of staff effort on any given enforcement action must remain at or below certain metrics.
30-20-101.5(2)(d) Establish schedules for timely completion of department activities including submittal reviews, inspections, and inspection reports.	The program has established timeliness guidelines for these activities and other activities.
30-20-101.5(2)(e) Establish a prioritization methodology for completing activities that focuses on actual risk to human health and the environment.	The body of this report explains how priority schemes are used in setting inspection schedules.
30-20-101.5(2)(f) Establish a preference for compliance assistance with at least 10 percent of the annual budget amount being allocated to compliance assistance efforts.	Earlier in this report, we present the percentage of staff time and budget that is spent on compliance assistance activities (14.4 percent in FY 2017).
30-20-101.5(2)(g) Establish a preference for alternative dispute resolution mechanisms.	The department already has established this preference. In recent years, the program has not had many disputes.
30-20-101.5(2)(h) Establish a mechanism that continually assesses and provides incentives for further improvements in the program's policies and procedures.	The department and division have vital rewards and recognition programs whereby process improvements or innovative ideas can be, and will be, rewarded.
30-20-101.5(3) Submit an annual report to the General Assembly by February 1 st of each year.	This report is the 9th annual installment of the program's efforts to meet this requirement.
30-20-122(1)(a)(I) Collect information and data on recycling, solid waste, and solid waste diversion including: (I) statewide and regional solid waste stream components including types of materials, quantities of materials, and flow of each material.	This report includes information and data on recycling and waste diversion including: statewide and regional waste stream components including material flow, the proportion of solid waste diverted to calculate a recycling rate, reutilized materials amounts and rates, technical and innovates solid waste management developments, and an inventory of sites performing recycling activities.
30-20-122(1)(a)(II) The proportion of solid waste generated in the state that has been diverted to other uses.	See Figure 8.
30-20-122(1)(a)(III) Reutilized materials, amounts, and rates	See Figure 10.
30-20-122(1)(a)(IV) Technical and innovative solid waste management developments	This report presents how the program has implemented improved technical developments and innovative approaches. The program will continue and expand those efforts.
30-20-122(1)(a)(V)A statewide inventory of sites and facilities performing recycling or other solid waste processing or diversion	These inventories are presented on our website.
30-20-122(1)(a)(VI)The number of jobs created and any other economic impacts resulting from the awarding of recycling resources economic opportunity grants made available pursuant to 25-16.5-106.7, C.R.S.	This information is independently reported to the Colorado Legislature in the Recycling Resources Economic Opportunities Program Annual Report prepared by the Sustainability Program within the Environmental Health and Sustainability Division at CDPHE.

HB07-1288 Statutory Requirement - Referenced section of the Colorado Revised Statutes (CRS)	Solid Waste Management Program Response
30-20-122(1)(a)(VII) Other data as necessary to further the purposes of Part 1.	This report presents a lot of information that goes beyond the statutory requirements.

CONCLUSION

As discussed in this report, the Hazardous Materials and Waste Management Division has implemented an effective and efficient Solid Waste Management Program satisfying the expectations set out in HB07-1288 (Section 30-20-101.5, C.R.S). Further efforts are always continuing to improve the Solid Waste Management Program.