Ohio Recycling Facility Certification Training
RCI Ohio Addendum History and Intent

- Challenges to Recycling in Ohio
- Ohio EPA Support for Recycling
- OEPA Solution to C&DD Fines
Challenges to Recycling in Ohio

- Potential creation of MSW
  - Based on historical Ohio EPA interpretation of the C&DD regulations residual material could be considered MSW
- Markets must be developed
Ohio EPA Solution to C&DD Residuals

Director Butler’s 2014 Letters to the Industry

- The letters state - material from a recycling facility is C&DD if:
  - No crushing, grinding or shredding occurs
  - Foreign materials are removed
- Work continues on a solution for a regulator’s difficulty in distinguishing fines from pulverized debris based on physical examination
Ohio EPA/CDAO Solution Part One:

The Recycling Certification Institute (RCI)

- Development of a third party facility validation program specific to Ohio
  - Ohio Specific RCI Addendum goals
    - Confirm business filings
    - Confirms that the recycling process does not create pulverized debris
    - Confirms the acceptance of OHIO defined C&DD only
Ohio EPA/CDAO Solution Part Two:

Recycler Certification ORC 3714.082

“...transfer facility to certify that material that is transferred from the transfer facility to the construction and demolition debris facility is not off-specification material; hazardous waste, solid wastes, or infectious wastes; or low-level radioactive waste whose treatment, recycling, storage, or disposal is governed under division (B) of section 3748.10 of the Revised Code. As used in this section, "hazardous waste," "solid wastes," and "infectious wastes" have the same meanings as in section 3734.01 of the Revised Code.”
Recycler Certification ORC 3714.082

- Once the facility is RCI Certified with the Ohio Addendum then the facility may use the form provided by Ohio EPA for certification of the material from the facility.
What is RCI?

- RECYCLING CERTIFICATION INSTITUTE
- OVERVIEW OF RCI
- OVERVIEW & OBJECTIVE OF CORR
- HOW DOES CORR WORK?
- RISK ASSESSMENT
- TYPES OF CERTIFICATION
RCI is an independent third party verification of information that is used across the country by recycling facilities.

For additional information on RCI please visit their website, www.recyclingcertification.org.
Overview of RCI

Organizational History
Board of Directors
Funding
Overview & Objective of CORR

- 3rd-party C&D facility certifications
- Protocols developed with industry input
- RCI protocols, procedures, and methodologies
How Does CORR Work?

- Facility first Registers with RCI, then submits “Application for Certification”
- RCI contracts with independent, third-party firms
- Trained as RCI Evaluators
- Evaluators, using RCI Protocols evaluate the processes, records, and reports of the facility.
Risk Assessment

- Risk-Based Evaluation
- Frequency of Scale Calibration
- Training of Facility Personnel
- Maintenance/Operation of Equipment
- QA/QC of Data Collection Process
- Use of EMS or Other Data Management
- Data Calculations
- Markets and Sales of Materials
Types of Certification

• CONDITIONAL or FULL
• SINGLE or MIXED MATERIAL
• MSW and MIXED MATERIAL COMBINED
• Application Process....
Background on the Addendum
Ohio EPA Solution Part One

- WHAT IS THE ADDENDUM?
- WHAT IS IT’S PURPOSE?
- HOW WILL IT BE USED?
The Ohio EPA and the Construction and Demolition Association of Ohio (CDAO), in an effort to increase recycling and alleviate the lack of material handling regulations over the C&DD recycling industry, has worked with the Recycling Certification Institute (RCI) to create an addendum to the RCI certification program.

This addendum is an independent verification of information for Ohio recycling facilities.

The addendum includes items which may be found in the existing RCI program.

The Ohio EPA and the CDOA have added to the existing RCI Program to create an Ohio specific document.
The purpose of the addendum is to provide information to the regulators which would be otherwise unavailable. Along with other information that may be required by the Ohio EPA, the addendum allows the regulators to make informed decisions about the resulting material from a RCI Certified Facility.
The Ohio EPA has created guidance documents which outline what and how OEPA programs will utilize the RCI Certification and the Ohio Addendum.

Additional agencies or programs may create other programs which utilize the RCI certification.
Who can be an Evaluator for Ohio?

- Any RCI Evaluator may do standard RCI Certifications in Ohio.
- Certain Evaluators will be qualified to sign a Certification that includes the Ohio Addendum.
  - Approved by RCI and the CDAO.
  - Must have 5 years of experience with Ohio C&DD laws.
The Addendum

WHAT THE EVALUATORS WILL BE LOOKING AT
Ohio Construction and Demolition Debris (C&DD) Recycling Addendum

- Facility Name -
- Facility Address -
- Property Owner Contact Information -
- Facility Operator Contact Information -
- Facility Operator 24 hr. Emergency Contact -
- Operational Start Date -
1. The facility operator is a Registered Business with the Ohio Secretary of State or its equivalent in another state if the facility is located outside of Ohio.
2. The facility has provided evidence of general liability insurance in the facility’s name.
3. The facility has provided notice of its operations by obtaining a permit/license or sending letters to the local fire department, any applicable health department, and the applicable environmental regulatory agencies.
4. If needed, the facility has an air emissions permit.
5. If needed, the facility has a storm water discharge permit.
6. The facility provided a material process description plan and narrative, describing maximum materials storage and access.
7. The facility provided a material acceptance plan which includes a process to reject materials.
8. The facility only accepts materials identifiable as C&DD as defined in ORC §3714.01 (e.g., brick, concrete, stone, or other masonry materials, glass, wall coverings, plaster, drywall, framing and finishing lumber, roofing materials, plumbing fixtures, heating equipment, & electrical wiring resulting from construction and demolition activities).
9. The facility is not authorized to accept materials that do not meet the C&DD definition in ORC §3714.01 (e.g., yard waste, furniture, appliances, bulk liquids, fuel tanks, drums, closed and filled containers, tires, batteries, hazardous waste, solid waste, infectious waste and low level radioactive waste).
10. The facility removes any materials not meeting the definition of C&DD in ORC 3714.01 (including de minimus amounts) during the first step of the recycling process and throughout the process if non C&DD materials are identified.
11. The facility ensures that any materials removed as referenced in No. 10 above, are disposed of or recycled in accordance with applicable local, state and federal laws.
12. The facility prohibits the acceptance of pulverized debris as defined in ORC §3714.01 (e.g. material which has been shredded, crushed, ground, or otherwise rendered to such an extent that the material is not identifiable as construction and demolition debris).
13. Material is not shredded or ground due to recycling/separation activities at the facility.
14. The facility does not crush the material except for a limited amount of incidental crushing caused by the equipment coming into contact with the material during the material handling process.
15. The facility has procedures and training in place to limit any incidental crushing of material caused by the equipment coming into contact with the material during the material handling process.
16. The facility operator’s name and contact information is posted at the entrance to the facility and it is current.
17. The facility has marked and readable signs describing both acceptable and prohibited materials at the entrance and tipping areas of the facility.
18. The facility provides safety training for its employees.
19. The facility restricts access to the site.
20. The facility provides training for its employees on procedures to address items in this addendum, as relevant to the positions in which they are employed, and the auditor can independently confirm employee knowledge and use of these procedures.
Certification of Transferred Materials
OEPA Solution Part Two Conclusion

• THIS CERTIFICATION USES THE RCI ADDENDUM TO VERIFY FACTS PRESENTED BY A RECYCLING FACILITY.

• A CERTIFICATION FORM IS PROVIDED BY THE OEPA AND SIGNED BY A FACILITY.
OEPA Provided Certification Form

“Certification that Transferred Material is not Ineligible Under Ohio Revised Code 3714.082”

- Includes all of the same statements from the Ohio Addendum
- Must meet 40% recycling rate
- Certifies the answers remain correct in the Ohio Addendum
- Includes a certification statement

Must be sent monthly to:

- Disposal Facility
- OEPA
- Applicable Board of Health for the Disposal Facility receiving the material
The Addendum will be included within the Evaluation Report on the RCI website. It will be publicly available information.