

Attachment B



Request to Submit: Contamination Remediation Plan

May 28th, 2021

Attention:

Taaj Daliran
Manager, Sanitation, Recycling, Cemeteries & Public Works Administration
Engineering and Public Works
2020 Labieux Rd.
Nanaimo, BC V9T 6J9

Re: Requirement to develop a Contamination Remediation Plan

Dear, Taaj

Thank you for taking the time to meet with me on May 26th, to discuss the City of Nanaimo Curbside collection program.

As per our discussion, Recycle BC continuously audits and monitors materials from partner collector's province wide. These audit results have identified an increasing trend of high rates of not-accepted materials (i.e. contamination) in your collection program.

As discussed in our meeting, section 2.1.2 of the Statement of Work states that all collected materials must not contain more than 3% by weight of contamination. The City of Nanaimo's program currently has a not accepted material rate over 8%.

Recycle BC is requiring the City of Nanaimo to develop and submit a formal Contamination Remediation Plan for the curbside program by **July 23rd** outlining actions and procedures to be implemented (with associate timeframes for each action) for the purpose of contamination reduction in order to maintain compliant with program requirements.

The request to develop a CRP is to be considered the onset of the Service Level Failure Credit (SLFC) Process.

A robust and comprehensive Contamination Remediation Plan is purposed to address Recycle BC's contamination concerns, reduce the amount of collected contamination to align with program requirements and avoid further escalation of the SLFC process.

Primary points of concern:

- 1) The high level of not accepted materials found in the curbside collection program, currently averaging above 8% posing operation concerns for Recycle BC and challenging program requirements.
- 2) The high level of incompatible materials, specifically film plastics and other flexible plastics, being collected in the curbside program, equating to an addition 1.5% of incompatible materials. As audit results are

formulated on a weight base platform, 1.5 % represents a large volume of these sorts of materials being collected.

Key Dates and Required Deliverables:

- 1) Submission of a curbside Contamination Remediation Plan, utilizing the attached Contamination Remediation Plan Templates as a guide along with a summarized list of all proposed actions/activities to implement and time frames for each action by **July 23rd** .

The attached Contamination Remediation Plan Requirements document and Contamination Remediation Plan Template will assist in plan development, though the intent is for individual collectors to develop a comprehensive plan, showing their understanding of and commitment to the Recycle BC program requirements.

As much detail as possible should be provided in this plan, inclusive of timelines for measuring results.

Thank you for your attention and immediate actions to these concerns.

If you have any questions, please do not hesitate to reach out.

I look forward to hearing from you,

Sincerely,



Brendan McShane
Manager, Collection Quality & Development
bmcshane@recyclebc.ca
250-634-1492

c.c.: Kirsten Gellein