



Administrative Rules Update 3 Comment Summary and Staff Response

This document includes public comments to ARR’s latest round of Administrative Rules updates. Some comments have been edited and combined for clarity. Direct quotes are put in quotation marks.

Bulk

Comment	Staff Response
<p>Please provide guidance on what to do with small amounts of construction waste. One idea is that a small amount of construction and remodeling debris could be picked up during bulk collection for a reasonable fee.</p> <p>[Reference 7.5.9.3]</p>	<p>ARR cannot accept construction waste due to operational challenges collecting this type of material.</p>

Household Hazardous Waste

Comment	Staff Response
<p>On-demand liquid household hazardous waste pickup should not be limited to 30 gallons.</p> <p>[Reference 7.7.8]</p>	<p>Staff set a 30-gallon limit for on-demand household hazardous waste pickup to accommodate the space available on the department's collection vehicles and to ensure all waste on the route for that day can be collected, as well as ensuring materials are at a safe weight for collection. If a customer has more waste they need picked up, they may schedule two additional on-demand pickups free of charge.</p>
<p>“Closing boxes and trusting the content is as noted is probably not a sound recycling guideline. Open for view is better in assuring the contents.”</p> <p>[Reference 7.7.6]</p>	<p>Only containers holding liquid HHW material need to be sealed. For example, if you have 8 small plastic bottles of HHW and you place them in a cardboard box for staff to pick up, you do not need to seal up the cardboard box holding the 8 bottles. Only the plastic bottles that have the HHW material need to be sealed securely. The contents of all containers are inspected by staff once it reaches the HHW facility.</p>

Customer ID Verification

Comment	Staff Response
<p>Commenters express concern that requiring residents to bring a utility bill to the drop off center is a barrier that may deter some people, including those who do not have a utility bill in their own name. Commenters suggest any identification with an address should be acceptable.</p> <p>[Reference 5.6]</p>	<p>In response to these concerns, staff amended the drop off requirements for customer verification and removed the requirement to present a utility bill.</p>

Extra Trash and Recycling

Comment	Staff Response
<p>Extra trash should be secured in a container to deter wildlife. The department should also consider adding additional trash drop-off locations throughout the City.</p> <p>[Reference 6.3.1.1, 7.1.10]</p>	<p>In order to maximize employee safety and avoid potential damage to personal containers, extra trash should be placed in a plastic trash bag next to the trash cart. Trash bags must be tied and secured to keep trash contained. Each bag of extra trash should not weigh more than 35 pounds. If wildlife, such as raccoons are a concern, consider placing extra trash bags out in the morning on the day of pickup.</p>
<p>“Might be helpful to re-add information about where to purchase the stickers.”</p> <p>[Reference 6.3.1.3]</p>	<p>To reduce the length of the Administrative Rules and account for the possibility that the list of businesses may change, the department does not specify which businesses customers may purchase extra trash stickers from within these rules. More information on where to purchase extra trash stickers can be found on the department's website at https://www.austintexas.gov/extrash.</p>
<p>Would the City consider offering extra recycling stickers as it does for trash?</p> <p>[Reference 6.3.2.1]</p>	<p>Extra recycling that does not fit into the blue cart with the lid closed may be placed next to the cart in a reusable container or a cardboard box no larger than your cart. Additionally, Customers may request a second recycling cart for free by calling 311. There is no charge for extra recycling.</p>

Carts

Comment	Staff Response
<p>Additional fees should not be charged if a trash cart's lid doesn't close flat.</p> <p>[Reference 7.1.10]</p>	<p>Overfilled carts are collected but are subject to an "extra trash" fee. The amount of the fee depends on the amount of trash preventing the lid from closing. Trash carts with multiple bags of trash sticking out will be charged an extra trash fee per bag of extra trash. Visit our website for the current fees.</p>
<p>“Being contained but over the top lip of the cart still allows automation dumping. Overflowing and dropping off, should be responsibly moved into another bag/container.”</p> <p>[Reference 7.1.10]</p>	<p>Thank you for your concern. Overflowing carts will be picked up; however, each bag of extra trash placed on top or beside the trash cart will be charged an extra trash fee. Visit our website for the current fees.</p>
<p>“Regarding 6.2.7, it may be helpful to also list 512-974-2000. Dialing 311 doesn't always work.”</p>	<p>Staff added the customer service phone number to the Rules.</p>

Accepted Material

Comment	Staff Response
Clarify if compostable bags are allowed in the compost cart. [Reference 7.4.8]	Third-party certified compostable bags such as those certified by BPI and TUV Austria are allowed in ARR's compost cart. To clarify, staff added "third-party certified compostable bag" to 7.4.8.
Please provide additional information on what "soiled paper" consists of. [Reference 7.3.9.7]	Please refer to the department's website to view what is acceptable to put in the composting cart. Staff will keep your suggestions in mind when redesigning the artwork on top of the composting carts.

Recycling Contamination

Comment	Staff Response
7.3.7 should be stricter and say that if plastic bags are visible in the cart, they will not be emptied, and a notice will be left indicating that the cart could not be picked up due to contamination. [Reference 7.3.7]	For fully automated recycling collection, in which the driver does not physically handle the recycling cart, the department has no way to track plastic bag contamination. For collection where staff physically empty the recycling cart into the truck, they open the lid to dump the cart and will quickly inspect the contents. If staff notices that recyclables are bagged as they pick up the cart, they will not pick up the material and leave the customer a notice stating their cart was not picked up due to contamination.
Consider paper leaf bags be used for extra trash or recyclables? [Reference 6.3.1.1]	Extra trash should be placed in plastic trash bags and placed next to the trash cart. This is for the safety of staff picking up the material and to reduce the mess often left by trash placed in paper bags. Extra recycling should be placed next to the recycling cart in a reusable container or cardboard box no larger than the cart. A paper leaf bag may be used for recyclables but should be labelled "recycling" for staff to quickly identify the material since paper leaf bags are most often used for leaves and small lawn trimmings.

Language Change Suggestion

Comment	Staff Response
<p>Please add disposal solutions to 7.3.9 for items that are not accepted in the curbside recycling cart.</p> <p>[Reference 7.3.9]</p>	<p>Information on what to do with items that are not accepted for curbside recycling is found on the department's website. The department has several tools available to help residents determine what to do with their items such as the What Do I Do With tool and the Austin Reuse Directory.</p>
<p>"7.4.10: should say 'The use of plastic bags for compost COLLECTION is prohibited.'"</p> <p>[Reference 7.4.10]</p>	<p>Staff accepted the suggestion and added the word "collection."</p>
<p>Define which holidays bulk items are not collected.</p> <p>[Reference 7.5.3]</p>	<p>Staff removed sentence mentioning holidays. Customers are required to schedule an appointment for on-demand services. They will be notified of their appointment date and set out instructions.</p>
<p>Staff should detail what the fees are for extra brush and bulk collection in the Rules.</p> <p>[Reference 7.6.3.2]</p>	<p>The fees for extra brush and bulk collection are subject to change every fiscal year. Brush fees are based on volume and bulk fees are based on weight. Visit the fee schedule webpage for the most up-to-date fee information.</p>
<p>For 7.5.3, use wording similar to 7.6.4. "...must be set out at the curb (not in an alleyway) on the scheduled appointment date."</p> <p>[Reference 7.5.3, 7.6.4]</p>	<p>Staff edited 7.5.3 and 7.6.4 for consistency and clarity.</p>