

City Auditor's Highlights

Audit of the City's Bulky Item Collection Service



Improvements are needed to improve timely bulky item pickups, reduce complaints from residents, and reduce overtime costs.

Problems at the refuse collection yards related to excessive sick leave, staffing shortages, and union memoranda of agreements have resulted in untimely bulky item collections and excessive overtime. ENV also needs to increase its efforts to educate residents on bulky collection guidelines, expand their monitoring and enforcement of violations, improve staffing in the Refuse Inspection Section, and improve residents' compliance with bulky collection rules.

Sick leave and LWOP are excessive.

From July 2015 to July 2016, 102 (of the 122) manual collection employees took 17,815 hours (2,227 days) of sick leave. The most sick leave taken by an employee was 928 hours (116 days). Between July 2015 and April 2017, 21 employees took over 3,900 hours of leave without pay (LWOP) due to insufficient leave balances. The most LWOP taken by an employee was 1,137 hours (142 days).

Bulky full loads are not maximized.

From January 2016 to July 2016, the majority of bulky item loads collected by each collection yard were below six tons (Honolulu 61%, Kapaa 69%, Laie 54%, Pearl City 61%, Wahiawa 61%, and Waianae 53%). The Waiialua collection yard (57%) was the only yard where the majority of the bulky item loads were six tons or more.



Overtime is excessive.

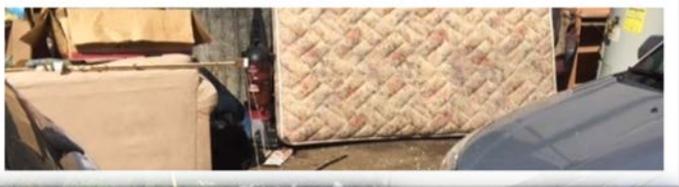
From July 2015 to July 2016, 153 employees received \$1.7 million in overtime for bulky and white goods collection. The most overtime received by an employee during the period was \$75,570.

Crews are picking up non-bulky items.

O'ahu residents are using the bulky item collection service to dispose of non-bulky refuse, as well as bulky refuse, and are not complying with bulky collection rules and guidelines. Refuse, recyclables, and green waste that should have been disposed of in the gray, blue and green carts were set out for bulky pickup. The only public education on refuse communicated to residents is done by the collection yard supervisors and refuse inspectors after a violation occurs.

Inadequate staffing for bulky collections and inspections.

The number of employees available for manual collection routes are insufficient to fully staff bulky item crews even if every scheduled manual employee reported to work on a given day. For example, because the Pearl City collection yard does not have enough drivers and collection employees to cover all of its manual routes on regular time, there are days when bulky items are not collected or collected on overtime. ENV's refuse enforcement program has inadequate staffing to monitor the entire island. Inspectors are constantly addressing complaints, and have neither the time nor resources to monitor the entire island and respond to violations. Although the collection yards and refuse inspection section have inadequate staffing, vacant positions are not filled.



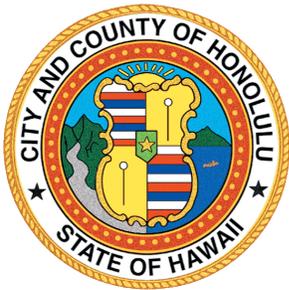
Types and Number of Bulky Item Collection Calls Received by CSD from Residents



We made recommendations to improve timely bulky item pickups, reduce complaints from residents, and reduce overtime costs. We also looked at how other cities with bulky item collection services compared with Honolulu (Appendix A).



Office of the City Auditor



**City and County of
Honolulu
State of Hawai`i**

**Report to the Mayor
and the
City Council of Honolulu**

Audit of the City's Bulky Item Collection Service

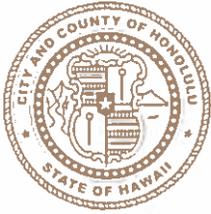
**Report No. 17-04
August 2017**

Audit of the City's Bulky Item Collection Service

A Report to the
Mayor
and the
City Council
of Honolulu

Submitted by

THE CITY AUDITOR
CITY AND COUNTY
OF HONOLULU
STATE OF HAWAII



**OFFICE OF THE CITY AUDITOR
CITY AND COUNTY OF HONOLULU**

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EDWIN S.W. YOUNG
CITY AUDITOR

August 11, 2017

The Honorable Ron Menor, Chair
and Members
City and County of Honolulu
530 S. King Street, Room 202
Honolulu, Hawai'i 96813

Dear Chair Menor and Councilmembers:

A copy of our final report, *Audit of the City's Bulky Item Collection Service*, is attached. This audit was initiated by the Office of the City Auditor pursuant to Section 3-502.1(c) of the Revised Charter of Honolulu and the Office of the City Auditor's Annual Work Plan for FY2016-17.

The audit assessed the timeliness and efficiency of the city's monthly bulky item collection service, and the effectiveness of the division's enforcement program for bulky item ordinance violations. In addition, the audit evaluated whether the division could improve the operational effectiveness and efficiency of the program and whether the costs of the bulky item collection services could be reduced.

Background

The city's bulky item collection service went from an appointment based service to island-wide regular, monthly pickups over a decade ago. The Department of Environmental Services (Refuse Collection Branch) is responsible for the regular, scheduled, monthly pickups for all residents.

Reported service problems included illegal dumping, untimely pickups, and residents placing bulky items out on unscheduled days. To resolve the problems, the city council introduced Bill 41 in May 2014 to establish a pilot program for fee based bulky item pickup by appointment only. In May 2016, Ordinance 16-9, Bill 24 was approved and increased the fine for illegal disposal of refuse, including bulky wastes.

Audit Results

We found opportunities exist for improving the timeliness and reducing the costs of the bulky item collection service. During our review, we found problems related to excessive sick leave, overtime, and leave without pay. More specifically: (1) from July 2015 to July 2016, 102 (of the 122) manual employees took 17,815 hours (2,227 days) of sick leave; (2) during the same period, 153 employees received \$1.7 million in overtime for bulky and white goods collection; and (3) from July 2015 to April 2017, 21 employees took over 3,900 hours of leave without pay due to insufficient leave balances.

The Honorable Ron Menor, Chair
and Members
August 11, 2017
Page 2 of 2

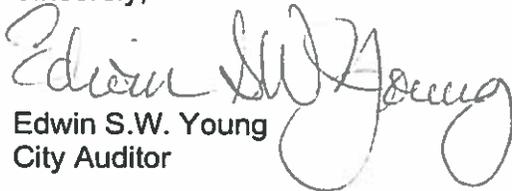
Staffing shortages and outdated union memoranda of agreements contributed to the untimely collections and excessive overtime. Even if every scheduled manual employee reported to work on a given day, there are not enough employees to fill all of the manual route crews, including bulky item collection crews at the collection yards. This resulted in bulky items not being collected or collected on overtime. We also found the majority of bulky item loads collected at six of the seven collection yards were below six tons.

Residents are using the bulky item collection service to dispose of non-bulky refuse, as well as bulky refuse, and are not complying with bulky collection rules and ordinances. ENV's refuse enforcement program has inadequate staffing to monitor the entire island and inspectors are constantly addressing complaints, but have neither the time nor resources to monitor the entire island and check for violations. Although refuse collection information is on the city website and through other sources, we believe ENV needs to proactively augment communications done by the collection yard supervisors and refuse inspectors after a violation occurs.

The Managing Director and the Department of the Environmental Services generally agreed with the audit recommendations and the proposed actions were responsive to the audit report.

We would like to express our sincere appreciation for the cooperation and assistance provided us by the managers and staff of the Department of Environmental Services, its Refuse Collection Branch, and the many others who assisted us during this review. We are available to meet with you and your staff to discuss the review results and to provide more information. If you have any questions, please call the auditor-in-charge, Darin Kawamoto, or me at 768-3134.

Sincerely,



Edwin S.W. Young
City Auditor

c:

Kirk Caldwell, Mayor
Roy Amemiya, Jr., Managing Director
Lori Kahikina, Director, Department of Environmental Services
Tim Houghton, Deputy Director, Department of Environmental Services
Nelson Koyanagi, Jr., Director, Department of Budget and Fiscal Services

Table of Contents

Chapter 1 Introduction and Background

Introduction	1
Background	1
Audit Objectives, Scope and Methodology	3
Audit Results	5

Chapter 2 ENV Can Reduce Overtime Costs by Improving the Timeliness and Efficiency of Bulky Item Collections

Background	8
Overtime is Excessive	13
Collection Yards Have Inadequate Staffing for Bulky Item Collections	15
Excessive Sick Leave Adversely Affects Bulky Item Collection Routes and Overtime	18
Bulky and White Goods Full Loads Are Not Maximized	21
Collection Yards Visited Were Behind Schedule in Collecting Bulky Items and White Goods	22
Recommendations	27

Chapter 3 ENV Needs to Expand its Enforcement of Bulky Item Violations and Educate Residents on Bulky Collection Guidelines

ENV Refuse Inspection Section Roles and Responsibilities	29
Inadequate Staffing Prevents Monitoring of Entire Island	30
Communicating Bulky Item Collection Guidelines to Residents Can Be Improved	30
Notice of Violations (NOV) Were Issued Mostly in the Honolulu Area	34
Comparisons with Other Cities	36
Recommendations	38

Chapter 4 Conclusions and Recommendations

Recommendations	40
Management Response	42

Appendices

Appendix A Comparison Cities	49
Appendix B Comparison Cities – Bulky Collection Frequency and Fees	59

Appendix C	Sector Map Used by Crew Leaders at the Honolulu Yard to Mark Completed Routes	61
Appendix D	Sector Map Used by Crew Leaders at the Pearl City Yard to Mark Completed Routes	63
Appendix E	Sector Map Used by Crew Leaders at the Kapaa Yard to Mark Completed Routes	65
Appendix F	Notice of Violation	67
Appendix G	Notice of Order	69

List of Exhibits

Exhibit 1.1	Department of Environmental Services Organizational Chart	2
Exhibit 1.2	Refuse Division Organizational Chart	3
Exhibit 2.1	O’ahu Bulky Item Collection Sectors Map	8
Exhibit 2.2	Rear Loading Packer Truck (left) and Flatbed Truck (right)	9
Exhibit 2.3	Bulky Item Collection Process	10
Exhibit 2.4	Types and Number of Bulky Item Collection Calls Received by CSD from Residents	11
Exhibit 2.5	Bulky and White Goods Employees with the Highest Overtime Totals (July 2015 – July 2016)	14
Exhibit 2.6	Bulky and White Goods Overtime Totals by Collection Yard (July 2015 – July 2016)	14
Exhibit 2.7	Total Authorized, Filled and Vacant Positions at the Collection Yards (FY 2016)	16
Exhibit 2.8	Bulky and White Goods Employees With the Highest Sick Leave Totals (July 2015 – July 2016)	19
Exhibit 2.9	Bulky and White Goods Employee Sick Leave Totals by Collection Yard (July 2015 – July 2016)	19
Exhibit 2.10	Bulky and White Goods Employees With the Highest LWOP Totals (July 2015 – April 2017)	20
Exhibit 2.11	Bulky Item Load Weights by Refuse Collection Yard	21
Exhibit 2.12	White Goods Loads by Refuse Collection Yard	22
Exhibit 2.13	Progress of Bulky and White Goods Crews During a Visit to the Honolulu Yard on the Second Wednesday of the Month	23
Exhibit 2.14	Progress of Bulky and White Goods Crews During a Visit to the Pearl City Yard on the Fourth Monday of the Month	24
Exhibit 2.15	Progress of Bulky and White Goods Crews During a Visit to the Kailua Yard on the Second Monday of the Month	25
Exhibit 2.16	A Collection Yard Supervisor Addressing a Missed Bulky Pick Up	26
Exhibit 3.1	Non-Bulky Items Set Out by Residents for Bulky Collection That Should Be Disposed of in the Gray Refuse Carts	31
Exhibit 3.2	Non-Bulky Items Mixed with Bulky Items and White Goods Set Out by Residents	32
Exhibit 3.3	Cardboard Boxes Set Out by Residents for Bulky Collection that Should Be Recycled in the Blue Recycling Carts	32
Exhibit 3.4	Branches Set Out by Residents for Bulky Collection That Should Be Disposed of in the Green Waste Carts or Cut for Bulky Pick Up	33

Exhibit 3.5	Prohibited Item (Concrete) Set Out by Residents for Bulky Collection	33
Exhibit 3.6	Bulky Collectors Picking Up Non-Bulky Items	34
Exhibit 3.7	Total NOVs Issued by Area and Type (May 2015-December 2016).....	35
Exhibit 3.8	Total NOOs Issued by Area and Type (May 2015-December 2016)	36
Exhibit 3.9	U.S. Cities with Bulky and White Goods Limits.....	38
Exhibit B.1	Bulky Collection Frequency Among Other Cities	59
Exhibit B.2	Bulky Collection Fees Among Other Cities	59

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Chapter 1

Introduction and Background

Introduction

This audit was initiated by the Office of the City Auditor pursuant to Section 3-502.1(c) of the Revised Charter of Honolulu and the Office of the City Auditor's Annual Work Plan for FY2016-17. The office of the city auditor determined this audit was warranted based on the number of complaints the city received related to the bulky item collection service.

The objectives of the *Audit of the City's Bulky Item Collection Service* were to assess: (1) the timeliness and efficiency of the city's monthly bulky item collection service; (2) the effectiveness of the division's enforcement program for bulky item ordinance violations; and (3) whether the division can improve operational effectiveness and efficiency and reduce costs of its bulky item collection service.

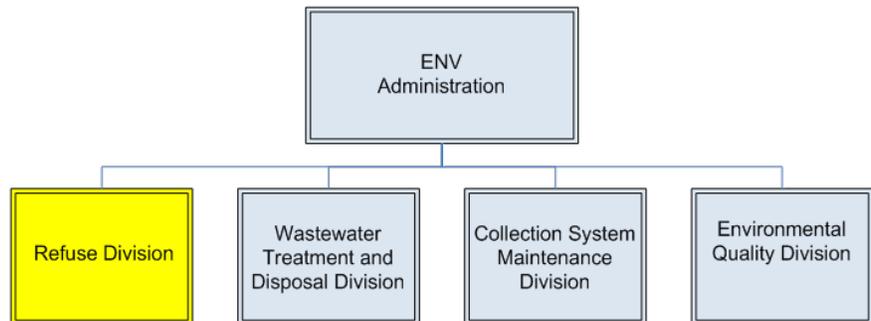
Background

The city's bulky item collection service went from an appointment-based service to island-wide regular, monthly pickups over a decade ago. The urban core of Honolulu was the first area to transition to regularly scheduled pickups. Around 2005, the other districts were converted to regular pickups, with the last district completed in 2006. The Department of Facility Maintenance's Roads Division was responsible for bulky item pickups when it was an appointment based service. As the districts transitioned to regular, monthly pickups, bulky item collection became the responsibility of the Department of Environmental Services' (ENV) Refuse Collection Branch. The transition to regular scheduled monthly pickups was supposed to reduce illegal dumping; provide more timely pickups; and provide the same service for all residents.

After converting to regularly scheduled monthly bulky pickups, problems persisted. These problems included illegal dumping, untimely pickups, and residents placing bulky items out on unscheduled days. To resolve the problems, the city council introduced Bill 41 in May 2014 to establish a pilot program for fee-based bulky item pickup by appointment only. In May 2016, Ordinance 16-9 (2016) was approved and increased the fine for illegal disposal of refuse, including bulky wastes.

The Department of Environmental Services' Refuse Division is responsible for administering, managing and planning the city's solid waste program. The program includes the collection of bulky items on O'ahu. Exhibit 1.1 below shows the ENV organizational chart.

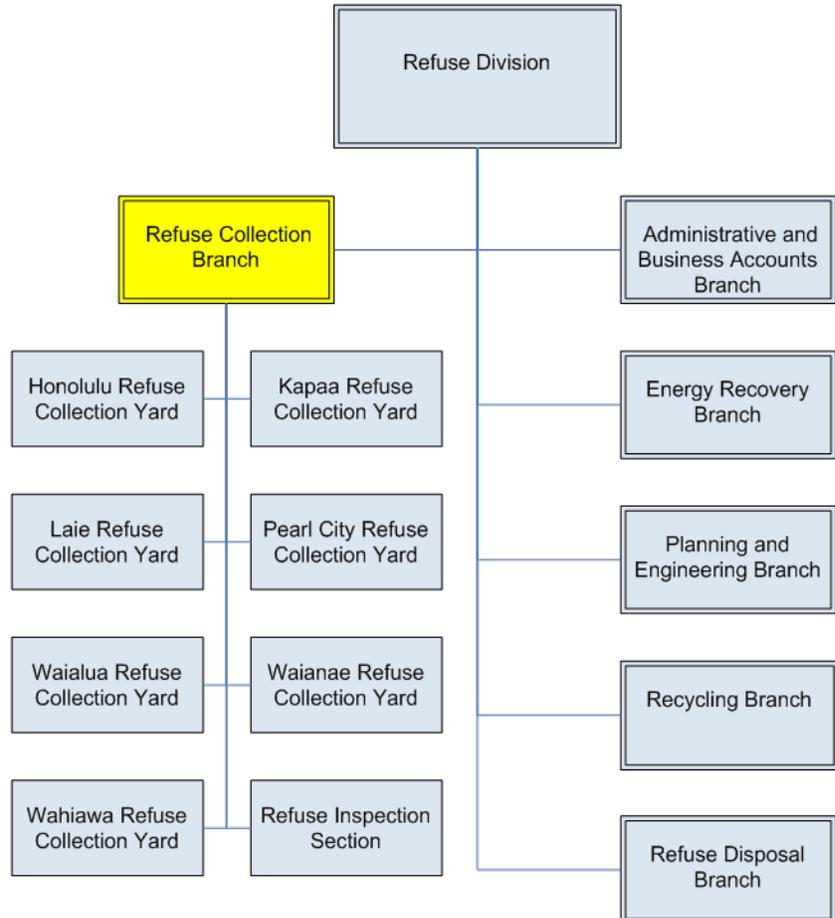
Exhibit 1.1
Department of Environmental Services Organizational Chart



Source: Office of the City Auditor and Department of Environmental Services

The Refuse Collection Branch is in the ENV Refuse Division. It oversees seven collection yards which are responsible for refuse collection of bulky items and white goods. The Refuse Inspection Section in the Refuse Collection Branch addresses and responds to bulky item violations such as off-schedule setout of bulky items, improper placement of items, putting out non-collectable items, and having no storage area for refuse. Exhibit 1.2 shows the Refuse Division organizational chart.

Exhibit 1.2
Refuse Division Organizational Chart



Source: Office of the City Auditor and Department of Environmental Services

Audit Objectives, Scope and Methodology

In order to meet the audit objectives, we reviewed pertinent city ordinances, state laws, and applicable city administrative rules, policies and procedures. We reviewed the Department of Environmental Services' report to the city council on enforcement and collection of bulky wastes, the opala website, the United Public Workers Unit 1 contract; the policies and procedures on task work for refuse collection, and the city memorandum of agreements with the United Public Workers union.

We visited three of the seven collection yards (Honolulu, Pearl City and Kapaa collection yards) that service O'ahu. We conducted interviews with key management and staff, observed typical work days at the collection yards, participated in ride alongs, and analyzed daily collection yard logs. We analyzed daily schedule sheets, route assignment sheets, and route completion sector maps. We analyzed bulky item and white goods loads, overtime, leave, and staffing totals covering the period from July 2015 to April 2017.

In the Refuse Inspection Section, we interviewed key management and staff, participated in a ride-along, and analyzed inspection logs. We interviewed Department of Customer Services management and staff, and analyzed their complaint logs related to bulky item collection.

We assessed the reliability of ENV's information by tracing the data to source documents and through observations of how the data was created and input. We assessed internal controls related to refuse collection, which were considered adequate and usable for our audit purposes. Although we questioned the completeness and accuracy of some data, we relied on documents and reports provided by ENV because it was the only information available at the time of our audit.

We identified other localities with similar populations to O'ahu that have bulky item and white goods collection services. Based on the availability of information, we compared collection methods, frequency, limits, and fees; enforcement of bulky collection regulations; alternative collection services; and prohibited items. We interviewed staff and requested information from the jurisdictions that enforced bulky item collection limits.

We are unaware of any audits performed on this issue.

This audit was performed in accordance with generally accepted government auditing standards from April 2016 to May 2017, and suspended for higher priority work from November 2016 through March 2017. These standards require that we plan and perform the audit to obtain sufficient and 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.

Audit Results

ENV and the Refuse Collection Branch managers need to address several refuse collection yard problems. These problems relate to excessive sick leave, staffing shortages, and union memoranda of agreements that have resulted in untimely collections and excessive overtime. More specifically:

- from July 2015 to July 2016, 102 (of the 122) manual collection employees took 17,815 hours (2,227 days) of sick leave;
- from July 2015 to July 2016, 153 employees received \$1.7 million in overtime for bulky and white goods collection; and
- from July 2015 to April 2017, 21 employees took over 3,900 hours of leave without pay due to insufficient leave balances.
- These absences increased untimely collections and the cost of collecting bulky refuse.

ENV also needs to increase its efforts to educate residents on bulky collection guidelines, expand their monitoring and enforcement of violations, improve staffing in the Refuse Inspection Section, and improve residents' compliance with bulky collection rules.

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Chapter 2

ENV Can Reduce Overtime Costs by Improving the Timeliness and Efficiency of Bulky Item Collections

Highlights

- 153 employees in the Refuse Collection Branch received \$1,691,572 in overtime for bulky and white goods collection (an average of \$11,056 per employee);
- 102 manual collection employees in the Refuse Collection Branch took a total of 2,227 days of sick leave (an average of 22 days of sick leave per employee); and
- 21 employees took over 3,900 hours of leave without pay due to insufficient leave balances.

Bulky item collection costs can be reduced. Between July 2015 and April 2017, 21 employees took over 3,900 hours of leave without pay due to insufficient leave balances. Even if every scheduled manual employee reported to work on a given day, there are not enough employees to fill all of the manual route crews, including bulky item collection crews at the collection yards. This resulted in bulky item collection crews completing routes on overtime.

In our opinion, Department of Environmental Services (ENV) managers and the Refuse Collection Branch managers could:

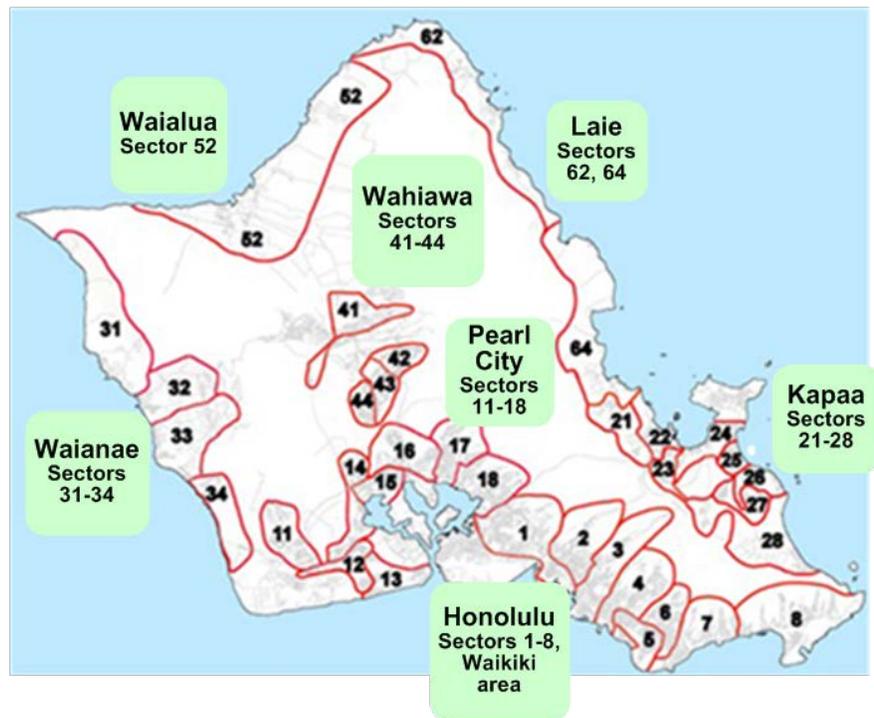
- reduce sick leave abuses by monitoring employees with patterns of absences and taking disciplinary action for sick leave abuses;
- reduce overtime by maximizing the daily number of bulky and white goods routes that are completed on regular time;
- address staffing needs and shortages at the refuse collection yards;
- maximize loads collected; and
- propose and negotiate updated agreements with the United Public Workers.

By resolving these issues, ENV managers can reduce untimely bulky and white goods collections and excessive overtime.

Background

Bulky Item Collection Service: O’ahu is divided into 35 sectors and the Waikiki area. Each of the sectors are assigned a set day every month for bulky and white goods collection, such as the second Monday of each month. The city collects bulky refuse every week, Monday through Saturday, except on Christmas Day and New Year’s Day. Seven refuse collection yards (Honolulu, Kapaa, Laie, Pearl City, Wahiawa, Waialua and Waianae) are responsible for bulky and white goods collections. Exhibit 2.1 shows the bulky item collection yards and sectors.

Exhibit 2.1
O’ahu Bulky Item Collection Sectors Map



Source: Office of the City Auditor and Department of Environmental Services

Bulky items: Bulky items include many things including lumber; iron pipes; radios; television sets; phonographs; bed frames; box springs; mattresses; furniture, including tables, sofas and chairs; sinks and other materials or equipment of a weighty or bulky nature. Tree branches or stumps over nine inches in diameter must be cut to lengths less than three feet. Bulky items also include rolled up and fastened carpeting; and materials for minor home repairs or remodeling not exceeding one cubic yard. Items that will not be collected as bulky items include: construction materials such as tile and drywall; demolition debris; dirt; rock; concrete; and large automobile parts. Refuse or recycling materials suitable for regular collection must be placed in the grey, blue, or green bins for regular trash pickup. Bulky items are collected in a rear loading packer truck (see photo below) and disposed of at the city's H-Power facility which burns the trash to generate electric energy for the city.

White goods: White goods are large, metal household appliances that include refrigerators; freezers; stoves; water heaters; air conditioners; washing machines; dryers; and dishwashers. White goods also include water fountains and coolers; microwaves; ice machines; and other large appliances. White goods are collected in a flatbed truck and disposed of at a recycling company in Kapolei.

Exhibit 2.2 shows the refuse trucks used to collect bulky items and white goods.

Exhibit 2.2
Rear Loading Packer Truck (left) and Flatbed Truck (right)



Source: Office of the City Auditor

All areas of the island are on a no-call, regular monthly collection schedule for bulky item pickup, except for the Waikiki area (every Saturday). Monthly scheduled pickups are conducted over a 3-4 day period, and is a free service. Bulky item collection is limited to residential dwellings. Commercial properties are required to arrange for collection of their refuse through private refuse haulers.

Residents are required to place their bulky items at the curb fronting their property by 6:00 AM on their scheduled collection day. Residents may place the bulky items outside the evening before the scheduled collection day. Exhibit 2.3 illustrates the bulky item collection process.

**Exhibit 2.3
Bulky Item Collection Process**



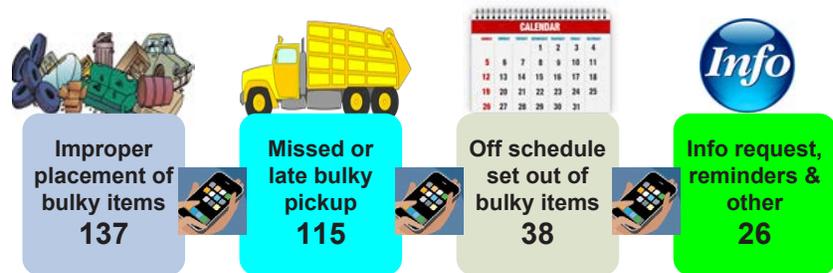
Source: Office of the City Auditor and Department of Environmental Services

Complaints: According to the city’s 2014 and 2015 *Service Efforts & Accomplishments Reports*, bulky item service was the seventh most complained about issue in FY 2015 and fourth most complained issue in FY 2014.

Over a third of the calls received by the Department of Customer Services (CSD) for bulky collections were complaints about missed or late pickups. Between May 2015 and April 2016, CSD received 316 calls from residents related to bulky and white goods collection. Complaints of improper placement of bulky items by residents, which included obstruction of sidewalks and streets; illegal dumping; and the creation of safety hazards amounted to 137 (43%) of the calls. Missed or late pickup complaints totaled 115 (36%) calls. There were 38 (12%) complaints about off schedule set out of bulky items by residents. Calls for information,

residents calling to provide collection reminders and other calls, which included complaints about collection crews leaving debris and tire markings on residents' properties totaled 26 (8%). The calls received by CSD are detailed in Exhibit 2.4.

**Exhibit 2.4
Types and Number of Bulky Item Collection Calls Received by CSD from Residents**



Source: Office of the City Auditor and Customer Services Department

After receiving a call or complaint related to bulky item collections, CSD creates a task order and assigns it to ENV. ENV has about two weeks to address the call or complaint. After ENV responds, CSD closes the task order.

As of May 2016, ENV had 38 overdue items related to bulky collections that were not closed by CSD. The overdue items ranged as far back as April 2013. Overdue items included complaints for missed pickups, improper placement of bulky items, and off schedule set out of bulky items. The collection yards and the refuse inspection section also received and addressed additional calls and complaints from residents related to bulky and white goods collection. The types and number of bulky item collection calls received by ENV is unknown because ENV does not maintain complaint or call logs.

Union agreement creates challenges for controlling overtime and staffing collection routes

The Memorandum of Agreement (MOA) requirements created daily challenges for collection yard supervisors when staffing and scheduling bulky item collection crews and reduced their ability to control overtime.

Union agreement: The United Public Workers (UPW) union represents the bulky item collection employees at the seven collection yards. The MOA between the city and the union contain modifications to the Unit 1 contract and the *Policies and Procedures on Task Work for Refuse Collection* (Ukupau). The MOA and Ukupau use task work to implement refuse collection policies and practices for the Refuse Division. The Ukupau policies and practices between the city and the union were effective July 2, 1973, and applies to all seven collection yards.

Each bulky items collection crew needs to consist of one crew leader and two collectors: The MOA states that each bulky item collection crew is required to consist of one refuse collection crew leader and two refuse collectors. The crew leader is the driver of the bulky or white goods truck. The bulky crew cannot start their route with less than three crew members, and if they have a full crew, one of the members needs to be qualified to drive. If these requirements are not met, then the bulky crew and truck would sit idle until a full crew is available. As a result, bulky routes are not completed or completed on overtime.

Bulky item route selection for crew leaders and collectors are based on seniority: About once a year, refuse workers at each collection yard select their routes based on their seniority and positions at the collection yard. The selection of relievers and the master pool is also based on seniority.

- Relievers serve as substitutes for crew members who are assigned routes and are not available to work the route due to sick leave, a day off, industrial leave, vacation, training or some other absence.
- The master pool consists of employees who do not have an assigned route. Supervisors assign workers in the master pool to any route that needs to be filled.

Once drivers and collectors select their routes, they cannot be taken off their assigned route and placed on a different route if their assigned route is scheduled to go out. If an employee is scheduled to work, and his or her route is not scheduled to go out that day, then the employee can be assigned to another route.

For example, the Honolulu yard has two full crews assigned to the bulky route, and the Pearl City yard has two collectors, but no refuse collection crew leader (driver) assigned to its bulky route. The other collection yards do not have assigned bulky crews and use available drivers and collectors to fill bulky crews.

The MOA requirements created daily challenges for collection yard supervisors when staffing and scheduling bulky item collection crews and reduced their ability to provide timely collection services and to control overtime.

An employee is considered to have completed the equivalent of a workday (eight hours) after collection of two full loads: Under the MOA, employees need to complete only two full loads to be paid for an eight hour workday. The MOA states an employee is considered to have completed the equivalent of an eight hour workday after collecting two full loads. The MOA also states that collection of additional full loads after collection of the first two full loads will constitute overtime, and states that an employee is credited with four hours of overtime for each full load collected.

The MOA further states that an employee is considered to have completed the equivalent of an eight hour workday after the collection of two full loads where the total weight is approximately 24,000 pounds (12 tons) for a compactor truck; 10,000 pounds for a flatbed truck; or the combination of 12,000 pounds for a compactor truck and 5,000 pounds for a flatbed truck. In the event the last load is a partial load, the partial load is considered a full load. The MOA restricts the ability of collection yard supervisors to provide timely services and to control overtime costs.

Overtime is Excessive

Overtime for bulky and white goods crews is a common occurrence at the collection yards. Inadequate staffing, sick leave abuses, and having to comply with the MOA terms have resulted in excessive overtime. Over a thirteen month period from July 2015 to July 2016, 153 employees received \$1,691,572 (an average of \$11,056 per employee) in overtime for bulky and white goods collection. Exhibit 2.5 shows the employees with the highest overtime totals for the period, and Exhibit 2.6 breaks down the overtime totals by collection yard.

**Exhibit 2.5
Bulky and White Goods Employees with the Highest Overtime Totals (July 2015 – July 2016)**

Analysis Highlights

- The top ten employees with the highest overtime hours for the 13 month period reviewed received a total of \$467,201 in overtime pay.

Rank	Employee	Yard	Overtime	
			Hours	Totals
1	A	Pearl City	2,013	\$75,570
2	B	Pearl City	1,517	\$65,981
3	C	Pearl City	1,373	\$59,924
4	D	Pearl City	1,299	\$48,253
5	E	Honolulu	1,093	\$47,853
6	F	Honolulu	1,072	\$40,450
7	G	Pearl City	804	\$34,960
8	H	Honolulu	904	\$33,987
9	I	Waianae	696	\$30,396
10	J	Honolulu	790	\$29,827

Source: Office of the City Auditor and Department of Environmental Services

**Exhibit 2.6
Bulky and White Goods Overtime Totals by Collection Yard (July 2015 – July 2016)**

Analysis Highlights

- In the 13 month period reviewed, the Honolulu and Pearl City collection yards paid a total of \$1,280,844 in overtime pay.

Collection Yard	Number of Employees Who Received Overtime	Total Overtime	Average Overtime Received Per Employee
Pearl City	42	\$677,072	\$16,121
Waianae	12	\$130,946	\$10,912
Waialua	3	\$32,377	\$10,792
Honolulu	60	\$603,772	\$10,063
Kapaa	24	\$204,885	\$8,537
Wahiawa	9	\$41,479	\$4,609
Laie	3	\$1,042	\$347

Source: Office of the City Auditor and Department of Environmental Services

In our opinion, ENV and refuse yard supervisors can reduce overtime in several ways. One way is to propose and negotiate changes to the MOAs and *Policies and Procedures on Task Work for Refuse Collection* to (1) eliminate the condition that two full loads are equivalent to a full eight hour workday, and (2) eliminate the overtime requirement for collecting more than two loads.

Overtime can be further reduced by maximizing the bulky item routes that go out on regular time. For example, there are days when morning bulky crews are sent out on overtime, or collection trucks are idle and routes are not done until the afternoon on overtime, or sometimes not done at all, because supervisors are unable to fill bulky crews in the morning to complete routes on regular time. As a result, employees who completed their two assigned loads and employees who come in to work on their day off to take a chance that work is available are used to fill bulky collection crews on overtime because of the lack of coverage at the collection yards.

There are overtime incentives for employees to do certain routes. For instance, the Pearl City collection yard is responsible for the white goods collection at the Waipahu and Ewa convenience centers. The routes are done 3-5 times a week, all on overtime. ENV and supervisors could reduce overtime by organizing the convenience center routes as regular time routes.

Collection Yards Have Inadequate Staffing for Bulky Item Collections

Refuse collection employees are grouped in accordance with the routes assigned to them. An automated route consists of a refuse collection equipment operator who uses an automated truck to collect refuse, recyclables and green waste in the gray, blue and green carts.

Manual crews collect refuse in areas not serviced by the automated routes. Manual collection personnel are used to fill crews for manual, bulky item, and white goods routes. Volunteers from the automated side are used if there are insufficient manual employees.

Collection yards have inadequate staffing to fill bulky item crews

Collection yards need an adequate amount of available manual employees to fill manual, bulky, and white goods crews. Even if every scheduled manual employee reported to work on a given day, there are not enough employees to fill all of the manual route crews, including bulky item collection crews at the collection yards. For example, the Pearl City collection yard requires 13 employees to cover its five manual routes, including a total of six employees for its bulky item and white goods routes. The yard has 14 manual employees, one of whom has been on industrial leave for a lengthy period of time and is not available to work. On any given day, two or three employees have the day off, leaving about eleven employees available to cover the manual routes. Employees on vacation, sick leave or in training further reduce the number of available manual employees.

As a result, although no one was on vacation or sick leave during our visit, we found the Pearl City yard collected only one bulky item load in the afternoon by using volunteers on overtime who had completed their assigned routes in the morning.

Our calculations show that if all the available manual staff reported to work on a given day, the Pearl City collection yard would still be short two to three staff to cover the manual routes. Because the Pearl City collection yard does not have enough refuse collection crew leaders (drivers) and refuse collectors to cover all of its manual routes on regular time, there are days when bulky items are not collected.

Vacant positions are not filled even though the collection yards' staffing are inadequate

In FY 2016, the seven collection yards had a total of 33 funded vacant positions. The Honolulu collection yard had 12 of the 33 funded vacant positions. Exhibit 2.7 shows the authorized, filled and vacant positions for the seven collection yards.

**Exhibit 2.7
Total Authorized, Filled and Vacant Positions at the Collection Yards (FY 2016)**

Collection Yard	Authorized	Filled	Vacant Positions		Positions*		
			Total	Funded	Filled	Vacated	Net Gain/Loss
Honolulu	128	100	28	12	19	9	10
Kapaa	34	26	8	5	4	4	0
Laie	8	7	1	1	0	1	-1
Pearl City	67	47	20	9	7	2	5
Wahiawa	22	16	6	3	3	3	0
Waialua	6	5	1	1	1	0	1
Waianae	17	13	4	2	5	2	3
Total	282	214	68	33	39	21	18

*Includes positions that were filled and vacated during FY 2016.

Source: Office of the City Auditor and Department of Environmental Services

Analysis Highlights

- The Honolulu collection yard had 12 of the total 33 funded vacant positions. This is 36% of the FY 2016 collection yard funded vacant positions.

The filled positions at the collection yards are inadequate to cover the current bulky item collection and white goods routes. For example:

- Although 68 positions (24% of the authorized staffing) were vacant, only 33 positions (12% of the authorized staffing) were funded.
- At the Honolulu collection yard, the funded vacancies composed 9% (12 positions) of the authorized staffing although the vacant positions totaled 22% (28 positions) of the authorized staffing.
- At the Pearl City collection yard, the funded vacancies composed 13% (9 positions) of the authorized staffing although the vacant positions totaled 30% (20 positions) of the authorized staffing.
- During FY 2016, filled positions were offset by personnel losses for a net gain of 18 employees. The net gain was insufficient to offset the vacancies.

In our opinion, resident complaints about missed and late pickups will continue and probably increase if the vacancies are not filled.

Collection yard supervisors must often pay workers overtime to fill scheduled bulky and white goods crews

The daily refuse collection schedule for each collection yard is prepared by the yard supervisors. Collection yard supervisors fill the refuse routes by scheduling crew members who are assigned to the routes through the annual selection process. Refuse employees have Sundays and another rotating day off during the week that varies for each employee. When preparing the schedule for the next day, managers make allowances for employee days off, vacations, industrial leave, trainings, and other scheduled absences. After taking into account all the scheduled absences for the next day, supervisors schedule relievers and workers from the master pool to fill in for crew members with scheduled absences.

Despite their pre-planning, supervisors often do not have enough staff to fill the collection routes. As a result, supervisors wait until the next morning to see if workers on their day off will come in to *take a chance* that work is available. Workers who come in on their day off and *take a chance*, are paid overtime to fill in for absent crew members. If there are no routes to fill, then the employee would return home without being compensated.

Excessive Sick Leave Adversely Affects Bulky Item Collection Routes and Overtime

On any given morning, employees calling in sick is a common occurrence. Collection yard supervisors fill the affected bulky item collection crews with workers from the reliever or master pools. If there is enough coverage from the reliever and master pools, bulky item collection routes are done on regular time.

If collection yard supervisors are not able to find enough workers from the master or reliever pools, supervisors will use employees *taking a chance* or volunteers willing to work after completing their assigned two loads. Employees *taking a chance* and volunteer workers are paid overtime.

Volunteers must complete their two full loads on their assigned routes before starting the bulky item routes. As a result, bulky collection crews go out later in the day on overtime, or sometimes may not go out that day.

ENV needs to control excessive sick leave

Between July 1, 2015 and July 31, 2016, there was a total of 17,815 sick leave hours taken by 102 (of the 122) bulky and white goods employees from the seven collection yards. This equates to about 2,227 days of sick leave or an average of 22 days of sick leave per employee for the 13 month period. The most sick leave taken by an employee during the period was 928 hours or 116 days at the Pearl City collection yard. Exhibit 2.8 shows the employees with the highest sick leave totals for the period, and Exhibit 2.9 breaks down the sick leave taken by collection yard during the period of July 2015-July 2016.

**Exhibit 2.8
Bulky and White Goods Employees with the Highest Sick
Leave Totals (July 2015 – July 2016)**

Analysis Highlights

- The top ten employees with the highest sick leave totals for the 13 month period reviewed took a total of 740 sick leave days. That is an average of 74 sick leave days per person.

Rank	Employee	Yard	Sick Leave Taken	
			Hours	Equivalent Days*
1	A	Pearl City	928	116
2	B	Honolulu	864	108
3	C	Laie	608	76
4	D	Honolulu	560	70
5	E	Laie	560	70
6	F	Honolulu	544	68
7	G	Honolulu	488	61
8	H	Honolulu	480	60
9	I	Honolulu	448	56
10	J	Honolulu	440	55

*Based on an eight hour workday.

Source: Office of the City Auditor and Department of Environmental Services

**Exhibit 2.9
Bulky and White Goods Employee Sick Leave Totals by Collection Yard
(July 2015 – July 2016)**

Collection Yard	Number of Employees Who Took Sick Leave	Total Sick Leave Hours Taken	Average Sick Leave Hours Taken Per Employee	Equivalent Average Sick Leave Days Taken Per Employee*
Laie	3	1,224	408	51
Pearl City	13	2,804	216	27
Honolulu	63	10,628	169	21
Waianae	5	767	153	19
Wahiawa	6	896	149	19
Kapaa	9	1,328	148	18
Waialua	3	168	56	7

*Based on an eight hour workday.

Source: Office of the City Auditor and Department of Environmental Services

ENV needs to counsel and take disciplinary action for sick leave abuse and leave without pay (LWOP)

The United Public Workers Unit 1 Agreement provides criteria for determining and investigating patterns of absences for sickness and disciplinary action for sick leave abuse. To establish a pattern, the employer must conduct a historical review and analysis of employee absences due to sickness for six months for regular employees and three months for non-regular employees.

As discussed above, an employee with an unacceptable pattern of absences due to sickness should be placed on a follow-up evaluation for a specific period of time not to exceed six months. If supported, disciplinary action for continued sick leave abuse² should be taken, including suspension and discharge.

Between July 2015 and April 2017, 21 employees took over 3,900 hours of leave without pay due to insufficient leave balances. Exhibit 2.10 shows the employees with the most LWOP during the period due to insufficient leave balances. Like sick leave abuse, corrective action may be needed to reduce or minimize any LWOP abuse.

Exhibit 2.10
Bulky and White Goods Employees With the Highest LWOP Totals (July 2015 - April 2017)

Analysis Highlights

- The top ten employees with the highest LWOP totals for the period reviewed took a total of 3,600 LWOP hours. That is a total of 450 LWOP days.

Employee	Collection Yard	LWOP Hours Taken Due to Insufficient Leave
A	Pearl City	1,137
B	Honolulu	864
C	Honolulu	456
D	Honolulu	387
E	Honolulu	198
F	Honolulu	162
G	Honolulu	154.5
H	Kapaa	104
I	Wahiawa	76.5
J	Honolulu	61

Source: Office of the City Auditor and Department of Environmental Services

² Since the inception of the sick leave abuse program in September 2015, nine bulky item collection employees were placed in the program, and one employee received disciplinary action. We believe overtime costs and staffing shortages will continue to be a problem if sick leave abuse and excessive LWOP are not controlled.

Bulky and White Goods Full Loads Are Not Maximized

The MOA is vague in what constitutes a full bulky item load and states that it is approximately six tons. The majority of bulky item loads collected by each collection yard were below six tons. The Waialua collection yard was the only yard where the majority of the bulky item loads were six tons or more. Exhibit 2.11 shows the bulky item load weights collected and highlights the weight ranges with the most loads for each collection yard.

Exhibit 2.11
Bulky Item Load Weights by Refuse Collection Yard (January 2016 - July 2016)

Collection Yard	Bulky Load Weights Collected*								Total Loads 6 Tons & Over
	<3 tons	3-3.99 tons	4-4.99 tons	5-5.99 tons	Total Loads Under 6 Tons	6-6.99 tons	7-7.99 tons	>7.99 tons	
Honolulu	3%	5%	18%	35%	61%	28%	9%	2%	39%
Kapaa	4%	10%	14%	41%	69%	24%	6%	1%	31%
Laie	0%	8%	31%	15%	54%	23%	0%	23%	46%
Pearl City	4%	5%	16%	36%	61%	32%	6%	<1%	38%
Wahiawa	7%	6%	14%	34%	61%	29%	9%	<1%	38%
Waialua	0%	0%	14%	29%	43%	43%	14%	0%	57%
Waianae	5%	9%	12%	27%	53%	36%	11%	0%	47%

*Percentages may not total 100% due to rounding.

Source: Office of the City Auditor and Department of Environmental Services

As shown above, 61% of bulky item loads collected by the Honolulu yard, and 69% of the Kapaa yard's loads were less than six tons. At the Laie yard, 54% of the loads were less than six tons, and 61% of the Pearl City yard's loads were under six tons. Similarly, 61% of the Wahiawa yard's loads were under six tons, and 53% of loads at the Waianae yard were less than six tons. The bulky item loads collected are not maximized.

Although the MOA states that 10,000 pounds for a flatbed truck constitutes two full loads, a full load for white goods is measured by the number of items, not by its weight. What constitutes a full load for white goods collection is not consistent and varies among the collection yards. For example, the Honolulu collection yard considers 27 to 30 refrigerators a full load, while the Pearl City collection yard considers 24 to 30 white goods items a full load. The variances for a full load of white goods is shown in Exhibit 2.12.

Exhibit 2.12**White Goods Loads by Refuse Collection Yard (January 2016 - July 2016)**

Collection Yard	Number of White Goods Collected Per Load*											Total Loads 26 Items & Over
	<23 items	23 items	24 items	25 items	Total Loads Under 26 Items	26 items	27 items	28 items	29 items	30 items	>30 items	
Honolulu	10%	11%	22%	18%	61%	17%	8%	5%	4%	2%	2%	38%
Kapaa	6%	4%	21%	13%	44%	11%	5%	4%	5%	5%	27%	57%
Laie	18%	4%	4%	11%	37%	9%	14%	4%	7%	5%	25%	64%
Pearl City	2%	5%	17%	18%	42%	16%	12%	9%	8%	7%	6%	58%
Wahiawa	4%	8%	22%	20%	54%	13%	10%	5%	6%	5%	5%	44%
Waiialua	10%	4%	13%	10%	37%	10%	10%	10%	6%	6%	19%	61%
Waianae	7%	13%	22%	15%	57%	13%	6%	6%	6%	2%	10%	43%

*Percentages may not total 100% due to rounding.

Source: Office of the City Auditor and Department of Environmental Services

As shown above, 61% of white goods loads collected by the Honolulu yard; 54% of the Wahiawa yard's loads; and 57% of the Waianae yard's loads were less than 26 items. In comparison, 57% of white goods loads collected by the Kapaa yard; 64% of the Laie yard's loads; 58% of the Pearl City yard's loads; and 61% of the Waiialua yard's loads were 26 items or more.

The bulky item and white goods loads collected are not consistently maximized by the collection yards. In our opinion, this resulted in the need for more collection runs and overtime to complete sectors.

Collection Yards Visited Were Behind Schedule in Collecting Bulky Items and White Goods

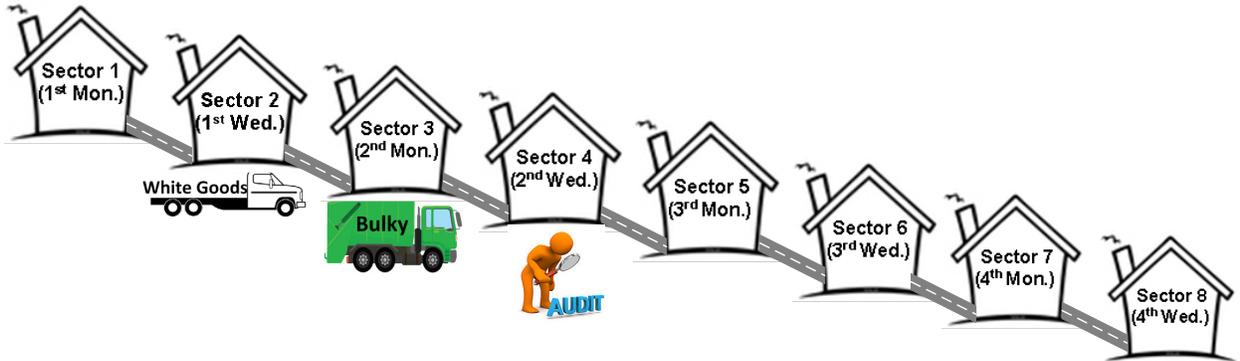
We visited three of the seven collection yard (the Honolulu, Pearl City and Kapaa collection yards). During our visits, we found that all three yards were behind schedule for bulky and white goods collection. For the Honolulu, Pearl City and Kapaa collection yards, the busiest sectors were scheduled consecutively, which makes it difficult for the crews to keep up. As a result, the staff will use the weeks when less demanding sectors are scheduled to catch up. Exhibits 2.13 – 2.15 show the progress of the bulky and white goods crews at each collection yard on the days of our visits.

Honolulu Collection Yard

The Honolulu collection yard, which is the largest of the seven yards, has a crew leader and two collectors assigned to each of the two regular bulky crews and one white goods crew. The Honolulu collection yard is responsible for bulky and white goods collection in the Waikiki area (every Saturday) and sectors 1-8,

which encompasses the area between Salt Lake and Hawai'i Kai. Sectors 1-4 are usually the busiest sectors.

Exhibit 2.13
Progress of Bulky and White Goods Crews During a Visit to the Honolulu Yard on the Second Wednesday of the Month



Source: Office of the City Auditor

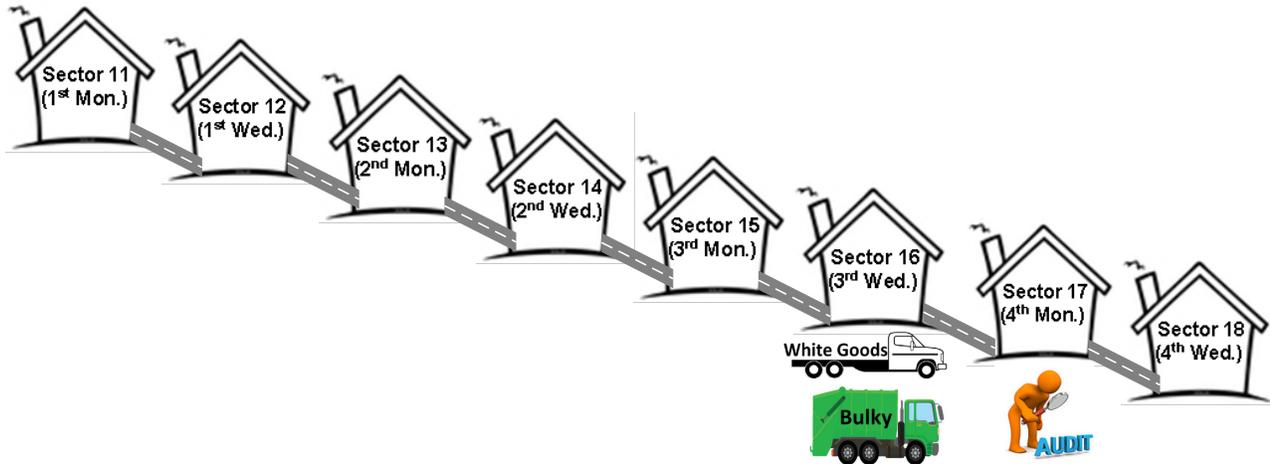
On the second Wednesday of each month, the Honolulu collection yard is scheduled to start bulky and white goods collection in sector 4. On the day of our visit, which was the second Wednesday of the month, the bulky crews were still completing sector 3 and the white goods crew was completing sector 2, and bulky or white goods collection did not start in sector 4. At the end of the day, four bulky and two white goods routes were completed. White goods collection was completed in sector 2, and bulky collection was still not completed in sector 3. Two of the bulky routes were completed on overtime.

Pearl City Collection Yard

The Pearl City collection yard has a regular bulky crew and a white goods crew, but the bulky crew does not have a driver or crew leader assigned to it. The Pearl City collection yard is responsible for bulky and white goods collection in sectors 11-18. Sectors 15-18 are usually the busiest sectors.

Exhibit 2.14

Progress of Bulky and White Goods Crews During a Visit to the Pearl City Yard on the Fourth Monday of the Month



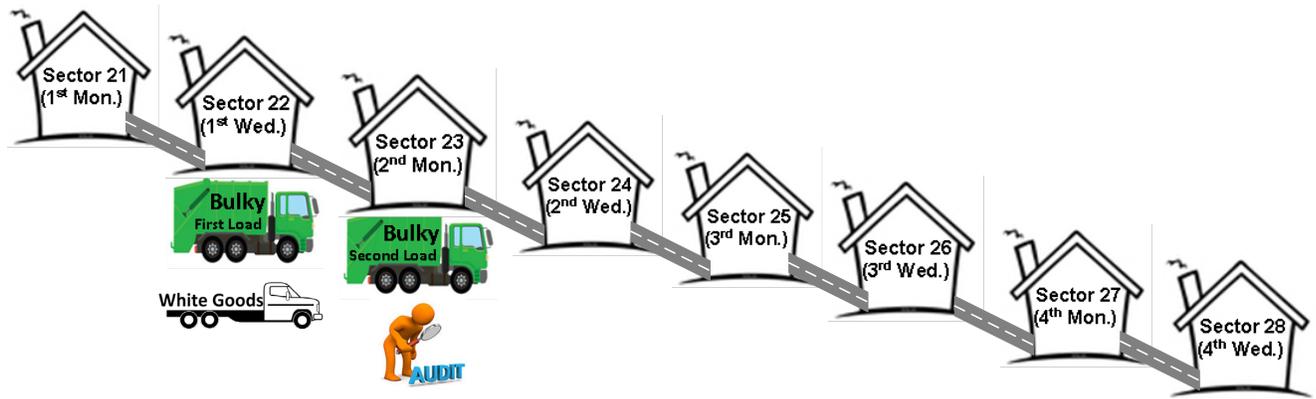
Source: Office of the City Auditor

On the fourth Monday of each month, the Pearl City collection yard is scheduled to start bulky and white goods collection in sector 17. On the day of our visit, which was the fourth Monday of the month, bulky and white goods crews were still collecting items in sector 16. At the end of the day, in total only six bulky loads were completed, which is about half the sector 16 route.

Kapaa Collection Yard

The Kapaa collection yard has one crew for bulky and white goods collection. The crew is filled with employees from the manual side of the yard. The Kapaa collection yard is responsible for bulky and white goods collection in sectors 21-28. Sectors 21 and 22 are usually the busiest.

Exhibit 2.15
Progress of Bulky and White Goods Crews During a Visit to the Kailua Yard on the Second Monday of the Month



Source: Office of the City Auditor

On the second Monday of each month, the Kapaa collection yard is scheduled to start bulky and white goods collection in sector 23. On the day of our visit, which was the second Monday of the month, the crew was still completing bulky and white goods collection in sector 22. The crew managed to start bulky collection in sector 23, and collected one load.

In our opinion, overtime for bulky item routes could be reduced by alternating busy sectors with less busy sectors; balancing out busy and less busy collection areas; combining slower manual routes; and maximizing bulky item routes that are done on regular time.

Missed bulky pickups occurred during our ride-alongs

Regular monthly bulky item collections require crews to drive along streets located in scheduled sectors and look for bulky items and white goods to pick up. In order to keep track of the streets where collection was completed, crew leaders draw lines through

streets or areas that were completed, so the next crew knows what areas still need to be completed.

- The Honolulu collection yard has two bulky crews, and two separate maps are used for each sector that need to be manually combined after the sector is completed.
- The Kapaa collection yard has one crew that collects bulky items and white goods. Crew leaders at the Kapaa collection yard draw lines through the streets that bulky items were collected and draw dots in the areas where white goods were spotted while picking up bulky items. After collecting the bulky items, the crew returns to the dotted areas on the map to collect the white goods.
- Appendix C-E shows the sector maps crew leaders use for the Honolulu, Pearl City and Kapaa collection yards.

Collection yard supervisors monitor streets to observe the bulky items that are set out and if residents are setting out their bulky items on time. Supervisors also monitor bulky and white goods crews on their routes and address complaints from residents, which include picking up missed bulky items. Exhibit 2.16 shows a collection yard supervisor picking up bulky items that were missed by the bulky collection crew. The supervisor observed that items were set out before the scheduled pick up and suspects that the bulky item truck did not back up far enough into the cul-de-sac to check for bulky items and a bush obstructed the crew's view.

Exhibit 2.16
A Collection Yard Supervisor Addressing a Missed Bulky Pick Up



Source: Office of the City Auditor

Recommendations

The Managing Director should direct ENV to:

1. Propose and negotiate updated memorandum of agreements with the United Public Workers to revise crew requirements, develop more flexible work rules, and develop more flexible crew compositions that allow ENV to schedule and complete bulky item collections within the regular eight hour work day.
2. Reduce overtime by proposing and negotiating changes to the union agreement(s) to eliminate the two full loads requirement and the overtime requirement related to collecting more than two loads.
3. Assess each collection yard's staffing needs, determine optimal staffing levels needed to maximize the number of bulky collection routes completed on regular time instead of overtime, and fill funded vacancies at the collection yards.
4. Control excessive sick leave by improving how employees with excessive sick leave, patterns of leave abuse, and leave without pay absences are monitored, and take disciplinary action for any leave abuses.
5. Establish bulky and white goods *full load* benchmarks and load weights for each collection yard to improve consistency and maximize the loads that are being collected.
6. Improve the efficiency of regular, monthly pickups by developing collection schedules that alternate bulky collections for busy sectors with less busy sectors for each collection yard.
7. Improve the efficiency of regular, monthly pickups by redrawing sector boundaries to balance out busy and less busy collection areas.
8. Combine slower manual routes to maximize refuse load weights and use the extra crews for bulky item collection.
9. Automate and standardize the system used by collection yards to monitor and keep track of routes completed by bulky crews.
10. Review the various approaches to bulky item collection used by other jurisdictions provided in Appendix A and propose the best approach for Honolulu going forward considering cost, efficiency, and community needs.

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Chapter 3

ENV Needs to Expand its Enforcement of Bulky Item Violations and Educate Residents on Bulky Collection Guidelines

Highlights

- Communication of bulky item collection guidelines to residents needs to be improved.
- During the period reviewed, there were a total of 903 Notice of Violations issued.
- Notice of Orders were mostly issued in urban Honolulu (75 NOOs) during the period reviewed.

ENV Refuse Inspection Section Roles and Responsibilities

The Department of Environmental Services' (ENV) lack of a plan to continually educate new and current O'ahu residents on bulky collection guidelines and objectives; inadequate staffing in ENV's Refuse Inspection Section; and residents' noncompliance with bulky collection rules have affected the timeliness and efficiency of the city's bulky collection service. For example, residents are setting items out too early; placing items in improper locations; setting out non-bulky items (including regular refuse, recyclables and green waste that should be disposed of in their carts); and setting out prohibited items, such as concrete.

Since inspectors are constantly addressing complaints, they do not have the time or resources to monitor the entire island and respond to violations. ENV needs to increase its efforts and be proactive when educating residents on bulky collection guidelines and objectives, and expand their monitoring and enforcement of violations island-wide.

ENV established its refuse enforcement program on May 1, 2013. The Refuse Inspection Section is responsible for investigating and resolving complaints regarding city refuse services by conducting field inspections; using surveillance to verify violations of codes and ordinances; report findings and recommendations; and making referrals to appropriate city or state agencies for follow-up action or prosecution.

Refuse Inspectors: The refuse inspectors are responsible for inspecting refuse set out for collection for violations of ordinances and policies; and notifying homeowners, business owners, and property managers of violations and proper preparation and placement of refuse and bulky items. Other duties include monitoring suspected illegal dump sites through surveillance; working with appropriate city agencies to issue property owners notices of violations of city ordinances and policies; and taking appropriate action for violations of ordinances and policies by issuing citations, warnings, and testifying in court.

Inadequate Staffing Prevents Monitoring of Entire Island

The Refuse Inspection Section is comprised of four inspectors, which includes the lead inspector, two field inspectors, and one inspector who receives and addresses complaints and communications from residents. The lead inspector divides his time between supervisory responsibilities and field inspections. One inspector is required to work from the office to fulfill his duties. The remaining two inspectors are available to work in the field and cover the entire island for all types of refuse violations. Since the inspectors are constantly addressing complaints, they have neither the time nor resources to monitor the entire island and check for violations.

Communicating Bulky Item Collection Guidelines to Residents Can Be Improved

More than half of the calls CSD received for bulky collection were complaints about other residents

Section 9-1.4(d) of the Revised Ordinances of Honolulu 1990 states that bulky wastes should be placed on the street so as not to impede vehicular traffic or the sidewalk, and not to impede pedestrian use. Items can be set out for collection no earlier than the evening before the scheduled day(s) of collection.

Most of the 316 calls related to bulky item and white goods collection received by the Department of Customer Services (CSD) between May 2015 and April 2016 from residents consisted of complaints about other residents.

Complaints of off schedule placement of bulky items and improper placement of bulky items by residents included obstruction of sidewalks and streets, illegal dumping, and the creation of safety hazards. These complaints totaled 175 (55%) of the 316 calls CSD received.

Bulky item collection crews are picking up non-bulky items that residents set out

According to Section 9-1.2 of the Revised Ordinances of Honolulu, bulky wastes consist of items such as lumber, iron pipes, refrigerators, stoves, radios, and television sets. Other bulky waste include phonographs, bedsteads, bed springs, tables, sofas, chairs, water heaters, and sinks. Tree branches over nine inches in diameter and other materials or equipment of a weighty or bulky nature may also be placed out for bulky item collection.

ENV's opala.org website also defines bulky items as furniture, mattresses, bed frames, box springs, rolled up and fastened carpeting, and appliances. Other bulky waste include minor home repairs or remodeling materials not exceeding one cubic yard;

and tree branches or stumps larger than nine inches in diameter, which must be cut to lengths less than three feet. Items that will not be collected as bulky items include: construction materials, such as tile and drywall; demolition debris; dirt; rock; concrete; large automobile parts; and any refuse or recycling material that is suitable for regular collection.

O’ahu residents took advantage of the city’s free bulky collection service by using the service to dispose of non-bulky refuse, as well as bulky refuse. Refuse, recyclables, and green waste that should have been disposed of in the gray, blue and green carts were set out for bulky pickup. During our ride-alongs, we observed that the bulky crews were picking up non-bulky items along their routes. According to the collection yards, non-bulky items are collected to avoid complaints and to prevent spending time and resources to resolve situations that usually end with the crew returning to pick up the refuse. Examples of the non-bulky items we observed during the ride-alongs are illustrated below.

**Exhibit 3.1
Non-Bulky Items Set Out by Residents for Bulky Collection
That Should Be Disposed of in the Gray Refuse Carts**



Source: Office of the City Auditor

Exhibit 3.2
Non-Bulky Items Mixed with Bulky Items and White Goods Set Out by Residents



Source: Office of the City Auditor

Exhibit 3.3
Cardboard Boxes Set Out by Residents for Bulky Collection that Should Be Recycled in the Blue Recycling Carts



Source: Office of the City Auditor

Exhibit 3.4
Branches Set Out by Residents for Bulky Collection That
Should Be Disposed of in the Green Waste Carts or Cut for
Bulky Pick Up



Source: Office of the City Auditor

Exhibit 3.5
Prohibited Item (Concrete) Set Out by Residents for Bulky
Collection



Source: Office of the City Auditor

Exhibit 3.6 Bulky Collectors Picking Up Non-Bulky Items



Source: Office of the City Auditor

Notice of Violations (NOV) Were Issued Mostly in the Honolulu Area

Notice of Violations (NOV) are issued to residents by refuse inspectors for refuse violations such as premature set out and improper placement of bulky items. Residents must correct all violations within seven calendar days from the date of notice. If no action is taken within the specified time:

1. A Notice of Order (NOO) is issued; and/or
2. The resident may be charged for the removal of items by city crews; and/or
3. The matter may be referred to the Prosecuting Attorney and/or Corporation Counsel for appropriate action.

Most of the NOVs issued from May 2015-December 2016 were in the Honolulu area where inspection efforts are focused. Of the 903 NOVs issued on O'ahu, 801 (about 89%) were given to residents living in the Honolulu area. Most of the NOVs were issued for off-schedule placement of bulky items. Exhibit 3.7 shows the total NOVs issued by area and type.

Exhibit 3.7**Total NOVs Issued by Area and Type (May 2015-December 2016)**

O'ahu Locations Collection Yard/Sectors	Number of Notice of Violations (NOV) Issued					Total NOV Issued
	Off-schedule setout of bulky items	Improper placement of bulky items	Non- collectable items	No storage area for refuse	Improper preparation of refuse	
Honolulu (Sectors 1-8)	738	40	5	17	1	801
Pearl City (Sectors 11-18)	59	5	1	1	0	66
Kapaa (Sectors 21-28)	5	1	0	0	0	6
Waianae (Sectors 31-34)	21	0	0	0	0	21
Wahiawa (Sectors 41-44)	6	0	0	0	0	6
Waialua (Sector 52)	2	0	0	0	0	2
Laie (Sectors 62 & 64)	1	0	0	0	0	1
Total	832	46	6	18	1	903

Source: Office of the City Auditor and Department of Environmental Services

Notice of Order (NOO) is issued if the violation is not corrected

After receiving an NOV, if the resident does not take corrective action within a week of receiving the notice, a Notice of Order (NOO) is issued. A resident who receives an NOO is ordered to pay a \$250 fine for each violation and correct the violation(s). If corrective action is not taken, the resident may also be assessed the cost to remove the refuse.

Of the 903 NOVs that were issued during the period, 99 were uncorrected or recurring violations and NOOs were issued and a fine assessed. Exhibit 3.8 shows the total NOOs issued by area and type.

Exhibit 3.8
Total NOOs Issued by Area and Type
(May 2015-December 2016)

Analysis Highlights

- 75 out of 99 total NOOs issued during the period reviewed were in urban Honolulu.

O'ahu Locations Collection Yard/Sectors	Number of Notice of Orders (NOO) Issued			Total NOO Issued
	Off-schedule setout of bulky items	Improper placement of bulky items	No storage area for refuse	
Honolulu (Sectors 1-8)	72	3	0	75
Pearl City (Sectors 11-18)	15	0	0	15
Kapaa (Sectors 21-28)	0	0	0	0
Waianae (Sectors 31-34)	0	0	0	0
Wahiawa (Sectors 41-44)	7	0	2	9
Waialua (Sector 52)	0	0	0	0
Laie (Sectors 62 & 64)	0	0	0	0
Total	94	3	2	99

Source: Office of the City Auditor and Department of Environmental Services

ENV needs to be proactive when educating residents on bulky and white goods guidelines

ENV had a public education campaign after the city's bulky item collection service went from an appointment-based service to island-wide regular monthly pickups. The campaign included newspaper ads, letters to Association of Apartment Owners (AOAO), brochures, press release, announcements to city council and neighborhood boards, and updates to the opala.org website. ENV also established a refuse inspection information line to answer questions and provide information, which is staffed by a refuse inspector.

Since ENV's campaign over a decade ago, the only public education on refuse communicated to residents is done by the collection yard supervisors and refuse inspectors after a violation occurs. Otherwise, residents need to either call the information line or go to the opala.org website for information.

Comparisons with Other Cities

As shown in Appendix A, 30 cities with bulky collection services were sampled across the country. The sample included cities with populations that ranged from 520,000 to 1.6 million.

Most U.S. cities in our sample enforce limits on the amount of bulky items that can be set out for collection

Of the 30 U.S. cities chosen to compare its bulky collection services with Honolulu, 23 cities enforced limits on the amount of bulky items and white goods that can be set out for collection. Of the 23 cities: 7 limited bulky refuse by cubic yards, 6 had weight limits, and 10 cities limited the number of items. The cities selected and a more comprehensive look at how Honolulu compared with other U.S. cities can be found in Appendix A.

For example, San Francisco residents are allowed to schedule two free bulky item pickups a year where each pickup is limited to ten bulky items. According to the San Francisco Department of the Environment staff, the city's bulky item collection limits do not affect the collection service or cause any major issues for the residents, government or workers. The department added that although residents are not setting out excessive amounts of bulky items, they are setting out bulky items without scheduling a pickup.

The City and County of Honolulu does not enforce any types of limits for its bulky item collection service. Limiting the amount of bulky items that can be set out during a collection period may reduce the amount of non-bulky and prohibited items that are set out.

By urging residents to use their refuse carts, encouraging residents to be more responsible when generating and setting out refuse, and promoting the use and locations of convenience centers, ENV may reduce the time and resources needed to collect non-bulky refuse, as well as improve the timeliness and efficiency of the bulky collection service.

Exhibit 3.9 U.S. Cities with Bulky and White Goods Limits



Source: Office of the City Auditor Sampling Results

Recommendations

The Managing Director should direct ENV to:

11. Develop a plan and program to continually educate new and current residents on bulky and white goods guidelines.
12. Review the refuse inspection section's staffing needs, determine optimal staffing levels needed to monitor and address refuse violations island-wide, and reallocate staffing resources as appropriate.
13. Limit bulky item collection to only items listed in the Revised Ordinances of Honolulu and the opala.org website and leave warnings on refuse not picked up.

Chapter 4

Conclusions and Recommendations

Despite going from an appointment based bulky collection system to a regular monthly collection schedule, illegal dumping, untimely pickups and residents not complying with bulky collection ordinances still persist.

Collection yard supervisors consistently encounter challenges when scheduling daily bulky and white goods crews. Even if every scheduled manual employee reported to work on a given day, there are not enough employees to fill all of the manual route crews, including bulky item collection crews at the collection yards. This resulted in bulky items not being collected or collected on overtime. Although collection yards have inadequate staffing, vacant positions remain unfilled. We also found the majority of bulky item loads collected at six of the seven collection yards were below six tons. During our visits to the Honolulu, Pearl City and Kapaa collection yards, all three yards were behind schedule in collecting bulky items and white goods.

Employees calling in sick cause bulky collection routes to be done late, on overtime, or not at all. Between July 1, 2015 and July 31, 2016, there was a total of 17,815 sick leave hours taken by 102 (of the 122) bulky and white goods employees from the seven collection yards. This equates to about 2,227 days of sick leave or an average of 22 days of sick leave per employee for the 13 month period.

Between July 2015 and April 2017, 21 employees took over 3,900 hours of leave without pay due to insufficient leave balances. Since the inception of the sick leave abuse program in September 2015, only nine bulky employees were placed in the program, and one employee received disciplinary action.

Excessive overtime is given for bulky routes that should be done on regular time. Inadequate staffing, sick leave abuses and having to comply with the Memorandum of Agreement (MOA) terms have resulted in excessive overtime. Over a thirteen month period from July 2015 to July 2016, 153 employees received \$1,691,572 in overtime for bulky and white goods collection, which averaged \$11,056 per employee.

The Department of Environmental Services' (ENV) refuse enforcement program has inadequate staffing to monitor the entire island. Since inspectors are constantly addressing

complaints, they do not have the time or resources to monitor the entire island and respond to violations.

ENV is not effectively communicating to residents the intended use of the bulky collection program. Residents are setting items out too early; placing items in improper locations; setting out non-bulky items, including regular refuse, recyclables and green waste that should be disposed of in their carts; and setting out prohibited items, such as concrete. Since ENV's campaign over a decade ago, the only public education on refuse communicated to residents is done by the collection yard supervisors and refuse inspectors after a violation occurs.

Improvements in these areas could improve timely bulky item pickups, reduce complaints from residents, and reduce overtime costs.

Recommendations

The Managing Director should direct ENV to:

1. Propose and negotiate updated memorandum of agreements with the United Public Workers to revise crew requirements, develop more flexible work rules, and develop more flexible crew compositions that allow ENV to schedule and complete bulky item collections within the regular eight hour work day.
2. Reduce overtime by proposing and negotiating changes to the union agreement(s) to eliminate the two full loads requirement and the overtime requirement related to collecting more than two loads.
3. Assess each collection yard's staffing needs, determine optimal staffing levels needed to maximize the number of bulky collection routes completed on regular time instead of overtime, and fill funded vacancies at the collection yards.
4. Control excessive sick leave by improving how employees with excessive sick leave, patterns of leave abuse, and leave without pay absences are monitored, and take disciplinary action for any leave abuses.
5. Establish bulky and white goods *full load* benchmarks and load weights for each collection yard to improve consistency and maximize the loads that are being collected.
6. Improve the efficiency of regular, monthly pickups by developing collection schedules that alternate bulky collections for busy sectors with less busy sectors for each collection yard.

7. Improve the efficiency of regular, monthly pickups by redrawing sector boundaries to balance out busy and less busy collection areas.
8. Combine slower manual routes to maximize refuse load weights and use the extra crews for bulky item collection.
9. Automate and standardize the system used by collection yards to monitor and keep track of routes completed by bulky crews.
10. Review the various approaches to bulky item collection used by other jurisdictions provided in Appendix A and propose the best approach for Honolulu going forward considering cost, efficiency, and community needs.
11. Develop a plan and program to continually educate new and current residents on bulky and white goods guidelines.
12. Review the refuse inspection section's staffing needs, determine optimal staffing levels needed to monitor and address refuse violations island-wide, and reallocate staffing resources as appropriate.
13. Limit bulky item collection to only items listed in the Revised Ordinances of Honolulu and the opala.org website and leave warnings on refuse not picked up.

Management Response

The Managing Director and the Department of Environmental Services generally agreed with the audit recommendations. ENV agreed that the current memorandums of agreement limited ENV's capacity to adapt to daily operational requirements and fluctuating staffing levels, and restricted management's ability to reassign available personnel as needed. ENV will include the issues raised in the audit, including overtime and load requirements in its negotiations with the union, and will monitor and enforce excessive sick leave rules consistent with the union contract. ENV will continue to maximize white goods loads, balance routes and schedules to improve service efficiency and reduce overtime use, and adjust collection schedules to balance the work load.

ENV will redevelop its website to improve access to service information although bulky item requirements and collection schedule information are currently available through a variety of sources such as the ENV website, a phone system, cable television (Oceanic Channel 32), and information brochures and calendars. ENV recently established six full time refuse inspector positions and will continue to improve compliance with city bulky item requirements through education and enforcement

To improve and maintain system efficiency, ENV is proposing an on-call, fee-based system for bulky collections and will continue to collect excess and unacceptable materials on its initial visit to avoid complaints and having to return later to collect the materials. A copy of the management response is found on page 43.

We found the management comments responsive to the audit report and audit recommendations. Although refuse collection information is on the city website and through other sources, we believe ENV needs to proactively augment communications done by the collection yard supervisors and refuse inspectors after a violation occurs.

**OFFICE OF THE MAYOR
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KIRK CALDWELL
MAYOR



ROY K. AMEMIYA, JR.
MANAGING DIRECTOR
GEORGETTE T. DEEMER
DEPUTY MANAGING DIRECTOR

August 8, 2017

Mr. Edwin S.W. Young
City Auditor
Office of the City Auditor
1001 Kamokila Boulevard, Suite 215
Kapolei, Hawaii 96707

Dear Mr. Young:

SUBJECT: Management Response to Final Draft Report dated July 10, 2017,
Audit of the City's Bulky Collection Service

Thank you for the opportunity to provide comments on the Final Draft Report. We appreciate the opportunities for the Department of Environmental Services (ENV) to meet with the staff of the City Auditor's Office throughout this audit and to provide information pursuant to its development. The recommendations in the comprehensive and informative report will receive thorough consideration as we continue to work to implement improvements to the City's refuse collection and bulky item service.

ENV has reviewed the Final Draft Report and responds to the recommendations as follows:

Recommendations: The Managing Director should direct ENV to:

1. Propose and negotiate updated memorandum of agreements with the United Public Workers to revise crew requirements, develop more flexible work rules, and develop more flexible crew compositions that allow ENV to schedule and complete bulky item collections within the regular eight hour work day.

ENV Response:

ENV concurs with this recommendation. The current memorandums of agreement (MOAs) limit ENV's capacity to adapt to daily operational requirements and fluctuations in staffing levels by restricting management's ability to reassign available personnel to other tasks within a baseyard as needed. The constraints imposed by the MOAs result in the work occasionally having to be completed on overtime and/or not being completed on schedule.

Mr. Edwin S.W. Young, City Auditor
August 8, 2017
Page 2

2. Reduce overtime by proposing and negotiating changes to the union agreement(s) to eliminate the two full loads requirement and the overtime requirement related to collecting more than two loads.

ENV Response:

ENV agrees that it is inefficient for crew work days to be limited to collecting two full loads and finishing in under eight hours, particularly when the sector has not been completed. ENV will include this issue in negotiations with the Union.

3. Assess each collection yards' staffing needs, determine optimal staffing levels needed to maximize the number of bulky collection routes completed on regular time instead of overtime, and fill funded vacancies at the collection yards.

ENV Response:

ENV will assess the staffing levels required to meet bulky collection requirements in each baseyard. This assessment will consider bulky collection methodology and changes in tonnage being collected over the last several years. Based on the assessments, ENV will seek the appropriate number of funded positions in future budgets to support the bulky collection program.

Staffing is also challenged because vacancies are first filled internally through promotions. Promoting existing staff is a positive that uses skills of existing employees and rewards good employees, but, it creates a subsequent vacancy in lower level positions.

4. Control excessive sick leave by improving how employees with excessive sick leave, patterns of leave abuse, and leave without pay absences are monitored, and take disciplinary action for any leave abuses.

ENV Response:

ENV will continue to implement the Sick Leave Abuse Program consistent with the Unit 1 contract. As noted in the report, since September 2015 through April 2017, the program has successfully monitored nine bulky item collection employees and disciplined one for an unacceptable pattern of sick leave use. Further, as a proactive measure to reduce the amount of unpaid leave, ENV will monitor employees' leave balances throughout the year and counsel employees with high leave usage rates on sustainable leave use. As appropriate, ENV will take a stricter approach with respect to disciplining employees who take leave but have no available accrued leave.

Mr. Edwin S.W. Young, City Auditor
August 8, 2017
Page 3

5. Establish bulky and white goods "full load" benchmarks and load weights for each collection yard to improve consistency and maximize the loads that are being collected.

ENV Response:

Per the bulky item collection MOAs, the current load weight standard is 24,000 lbs for two loads in a bulky rear-loader compactor truck and 10,000 lbs for two loads in a flat bed (white goods) truck. Because flat bed trucks are not weighed either at the collection yard or at the disposal site, ENV has determined that 25-30 white goods on a flat bed truck constitute a full load. The amount of white goods a flat bed truck can hold varies depending on the size of the white good (for example, refrigerators take up significantly more space than a window air conditioning unit), so it is not appropriate to establish a standard for unit count benchmark for flat bed trucks. ENV will continue to work to ensure that each truck load contains the maximum amount of white goods the truck can or should carry to ensure greatest hauling efficiency.

6. Improve the efficiency of regular, monthly pickups by developing collection schedules that alternate bulky collections for busy sectors with less busy sectors for each collection yard.

ENV Response:

ENV will address the issue of "busy and less busy", or heavy and less heavy (tonnage) areas through a combination of constructing routes based on bulky item tonnage data and, if necessary, adjusting collection schedules to ensure evenness of work load and continuity of service. ENV anticipates increasingly balanced routes and workloads as it continues to gather data for future use in constructing routes. Balanced routes and revised scheduling will also improve service efficiency and reduce overtime use.

7. Improve the efficiency of regular, monthly pickups by redrawing sector boundaries to balance out busy and less busy collection areas.

ENV Response:

See response to recommendation 6. ENV will construct efficient routes using historic tonnage data and, if necessary, adjust collection schedules to balance the work load.

8. Combine slower manual routes to maximize refuse load weights and use the extra crews for bulky item collection.

ENV Response:

ENV will continue to use tonnage data to adjust route sizing to improve efficiency in its manual collection system. As is currently the practice, any "extra" manpower will be used to complete scheduled work tasks.

Mr. Edwin S.W. Young, City Auditor
August 8, 2017
Page 4

9. Automate and standardize the system used by collection yards to monitor and keep track of routes completed by bulky crews.

ENV Response:

ENV will investigate technology and other opportunities that will enable more efficient and accessible monitoring of collection progress in bulky item sectors.

10. Review the various approaches to bulky item collection used by other jurisdictions provided in Appendix A and propose the best approach for Honolulu going forward considering cost, efficiency, and community needs.

ENV Response:

ENV appreciates the information contained in the audit report, particularly that presented in Appendixes A and B on "Comparison Cities" which will serve as a reference guide as we work to improve the bulky collection program. Of note, of the municipal bulky item programs identified, a plurality (38%) were categorized as "Special Arrangement" in terms of collection frequency. With respect to collection fees, 19% of the cities have some sort of collection fee associated with their service. These programs are aligned with ENV's vision for an appointment and fee-based bulky collection system that will increase service efficiency, limit the set out of unauthorized bulky items for collection, and reduce collection costs.

Notwithstanding routing and scheduling improvements, ultimately, ENV believes the best way to achieve operational efficiency will be to transition from the current and inefficient island wide regularly-scheduled monthly bulky item collection service to an on-call appointment-based system whereby residents contact ENV when they need their bulky items collected and ENV dispatches a crew to collect the items. Further, to maximize the benefits of an on-call system, it should be coupled with a collection fee to offset service costs. In the current system, refuse collection supervisors and crews must drive and inventory entire collection sectors every month in advance of the regular-scheduled collection. An on-call and fee-based system, which would eliminate the need for a monthly sector-wide survey and allow collections staff to focus on only those addresses that have pre-scheduled their pickups, is the most effective way to improve the operational and financial efficiency of the City's bulky item collection service.

11. Develop a plan and program to continually educate new and current residents on bulky and white goods guidelines.

ENV Response:

ENV will continue to improve its methods for communicating bulky item service information to residents. Bulky item set out requirements and collection schedule information is currently available through a variety of channels,

Mr. Edwin S.W. Young, City Auditor
 August 8, 2017
 Page 5

including the ENV website (opala.org), an automated phone system, and The Green Channel (Oceanic channel 332). ENV also distributes bulky item informational brochures and calendars to residents throughout the year. ENV recognizes the importance of evolving its communication mediums to continue to ensure convenient access to clear and accurate information as a way to promote effective program participation. Among other projects, ENV is currently redeveloping its website to improve access to high-quality service information. Such enhancements should lead to increasingly informed program participation and reduce instances of untimely bulky item set out and set out of unacceptable materials. Education regarding bulky collection will be even more important if a switch is made to the proposed on-call system.

12. Review the refuse inspection section's staffing needs, determine optimal staffing levels needed to monitor and address refuse violations island-wide, and reallocate staffing resources as appropriate.

ENV Response:

ENV recently established six full time permanent Refuse Inspector positions and is in the process of filling these positions. Six positions represent a 50% increase in inspection capacity from the time of this audit. More Inspectors will allow ENV to more proactively address issues of off-schedule set out and illegal dumping through education, awareness, and enforcement of existing City ordinances pertaining to refuse placement and illegal dumping.

13. Limit bulky item collection to only items listed in the Revised Ordinances of Honolulu 1990 and the opala.org website and leave warnings on refuse not picked up.

ENV Response:

This requires the continual public education referred to in recommendation 11 to provide more public awareness of and/or compliance with the City bulky item placement requirements in Section 9-1.4 of the Revised Ordinances of Honolulu. Currently, bulky item collection crews are instructed to collect only that waste which qualifies as bulky per the Revised Ordinances of Honolulu and leave behind that which does not. This occasionally results in complaints being lodged with the City related to the uncollected material. When the complaint is received, to address the issue quickly and with minimal impact to the environment, the bulky item collection crew is often instructed to return to the site to collect the unacceptable material. Because of this, all bulky material, including any excess and/or unacceptable material, is now generally collected at the initial visit to avoid having to return later. Given the instructions to return to collect the excess, this practice is more efficient.

ENV will continue to work to improve compliance with City bulky item placement requirements through education and enforcement. As noted in the response to recommendation 12, having more Refuse Inspectors will help to address issues of compliance with bulky item placement.

Mr. Edwin S.W. Young, City Auditor
August 8, 2017
Page 6

We appreciate that this audit was conducted in a collaborative manner between the City Auditor's office and the Department of Environmental Services. As indicated, we agree that many of the recommendations can have positive benefits to improving the City's bulky collection program. ENV staff will be looking at the opportunity to make substantial changes to the delivery of bulky collection services.

We look forward to working with you and your staff on implementation of these recommendations.

Warm regards,


Roy K. Amemiya, Jr.
Managing Director

cc: Nelson H. Koyanagi, Jr., Director
Department of Budget & Fiscal Services
Lori M.K. Kahikina, P.E., Director
Department of Environmental Services

Appendix A

Comparison Cities

Cities	Collection Method	Collection Schedule/Frequency	Bulky Item/White Good Limits	Collection Fees	Violations/Enforcement	Alternative Collection Services	White Good Collection
Honolulu	All areas of the island are on a no-call, regular monthly collection schedule, and conducted over a 3-4 day period for bulky item pick up.	Monthly	No limits	Free service for residents.	Property owners are subject to fines up to \$250 per offense, individuals are subject to fines up to \$2,500 per offense.	Convenience center, private hauler, or Salvation Army, etc.	Collected as part of the bulky item collection service.
Phoenix	Residents have collection days scheduled 4 times a year. They cannot place materials out for collection more than one week prior to the week of collection. Items must be placed by 6 am on 'Collection Begins Week Of' date.	Quarterly	20 cubic yards	Free	It is a violation of city ordinance to place trash out before the listed "Placement Begins On" date.	Private hauler	Collected, excluding refrigerants such as freezers, refrigerators and air conditioners
Tucson	Residents set out brush & bulky materials by 6 a.m. on Monday of their collection week. Items should be placed where the trash is collected.	Twice a year	10 cubic yards	Monthly fee based	Any findings of responsibility or liability for violations noted shall incur fines of \$100-\$2500 per violation.	Special collection can be scheduled any time by phone.	Collected, excluding freezer/refrigerator doors.
San Jose	Residents must schedule a large item pick up by directly calling their collection company to make an arrangement.	Call for pick up.	Limit of 3 items per pick up.	The first two large item collections are free each year. Additional large item collections are available for \$27.23 (up to 3 items).	First violation from \$2,500, \$5,000 for the second, and \$10,000 for three or more.	Handled by a recycling collection company.	Collected through bulky item collection.

Cities	Collection Method	Collection Schedule/Frequency	Bulky Item/White Good Limits	Collection Fees	Violations/Enforcement	Alternative Collection Services	White Good Collection
San Francisco	Residential customers can schedule a bulky item recycling pick up using an online form or by phone.	Online form or by phone.	Up to 10 items per collection; with up to 10 additional boxes, bags, or bundles of textiles.	No additional charge for the first two, additional pickup may be arranged for a nominal fee.	As of 2016, fines remain at \$100 for a single occupancy home.	The City suggested to take it to donation centers and thrift stores.	Collected through bulky item collection.
San Diego	There are two types of major community cleanups and recycling events: 1) Bin Cleanups – bring items to a specific location, and 2) Packer Cleanups – place the items at curbside where regular trash is collected.	Scheduled events (varies)	Information not available.	Part of the Community Cleanup Event. Information not available.	Violators are arrested and their belongings are taken for safe keeping and stored.	60-70 community cleanup/recycling events each year put on by Solid Waste Code Enforcement Officers and community groups.	Collected through bulky item collection.
Fresno	To minimize illegal dumping, collection dates are not publicized. Residents will receive a flier at their doorstep announcing the schedule at least one week prior. Residents can find out collection dates by calling as well. Place in the same location as regular garbage pickup by 6 am on the scheduled day of pick up.	Once a year, residents are notified of dates through fliers.	Varies	Only residences that currently pay their Sanitation Fee on the utility bill will be serviced.	Any illegal dumping will be referred to code enforcement for possible citation and/or legal action.	Recycling Program Hotline for options.	Collected through bulky item collection, but large appliances and refrigerator doors must be secured or removed.

Cities	Collection Method	Collection Schedule/Frequency	Bulky Item/White Good Limits	Collection Fees	Violations/Enforcement	Alternative Collection Services	White Good Collection
Portland	Residents must put together a list of the bulky items. They fill out an online form and make a payment via PayPal. When the transaction is complete, they will receive an email confirmation. Bulky item tags will be mailed to them when it is available.	Request service online.	Limit of 10 items per dwelling unit per year.	Free for small bulky items, \$40 disposal fee per large item.	The costs involved for cleanup, hauling and proper disposal of illegal dump sites will be charged to the violators.	Charitable organizations or listed organizations on the City website. Local companies that are contracted with the City of Portland.	Not collected through bulky item collection. Residents must use alternative options.
Las Vegas	Palm fronds are considered a bulky item and need to be tied up and neatly placed at the curb for pickup. Household appliances and other items that do not fit in the carts are also considered bulky items and will be collected on scheduled bulky pickup dates.	Every other week	Information not available.	Fee based	First violation- misdemeanor, second violation- imprisonment for 14 days not more than 1 year, third violation- imprisonment for 1 year.	Schedule a pickup for extra charge for removal, or drop off centers.	Not collected through bulky item collection.
Seattle	Items must be placed outside on the customer's property, on a flat, level surface and easily accessible from the street. Items must be out at the collection point by 7 a.m. the day following the call to schedule the pick-up, and will be collected within 5 business days.	Schedule for pickup.	Limit of 8 by 4 feet in diameter. Electronic waste cannot exceed 60 lbs. and 2' x 2' x 2'. No items weighing more than 300 lbs.	\$30 per item, \$38 per item containing CFCs, and \$20 per pickup of 3 electronic items.	First time penalty: \$150, for additional violations: \$500; fines are higher in certain zones and inspection charges may also apply.	Private hauler	Collected through bulky item collection.

Cities	Collection Method	Collection Schedule/Frequency	Bulky Item/White Good Limits	Collection Fees	Violations/Enforcement	Alternative Collection Services	White Good Collection
Denver	Residents place the items out by 7 a.m. Items must be visible and placed at least 2 ft. away from the trash and recycling container, car, poles, and other obstructions. Only set out large items during the scheduled Extra Trash Service week.	Every four weeks	A maximum of 10 bags of trash and 5 large items. No larger than 4 feet in height or not more than 50 pounds for each item.	Part of the Denver Solid Waste Management collection service. Appliance collection service is free.	Any items set out other than the scheduled time are considered illegal dumping and in violation of city code.	Private hauler	Not collected through bulky item collection.
Indianapolis	Each Indianapolis household may place a maximum of two (2) items of heavy trash out for collection each month. Place all items on a stable surface. Secure and/or remove loose parts such as doors or trim.	Monthly	Up to 2 items per pick up	Free	\$388 for the abatement plus cleaning fee. Evidence uncovered during the investigation could lead to prosecution and a fine of \$2500.	The City of Indianapolis offers Marion County residents alternatives to illegally dumping waste.	Collected, excluding Freon-gas refrigerant. Appliances containing Freon require special handling.
Columbus	Residents must contact the City's 311, Customer Service Center to schedule collection of bulky items. Place bulky items in front of house but away from any obstructions on your scheduled collection day.	Residents should contact the City's 311 to schedule collection of bulky items by calling 311 or scheduling online.	No limit	Free service for residents.	The responsible party may be taken to Environmental Court and may be fined or held responsible for the clean-up.	HandsOn Program (Provide referrals to organizations that will accept donations of bulky items), or private hauler.	Collected, excluding refrigerators

Cities	Collection Method	Collection Schedule/ Frequency	Bulky Item/ White Good Limits	Collection Fees	Violations/ Enforcement Amendments	Alternative Collection Services	White Good Collection
Detroit	All items should be at the curb by 7 a.m. on the scheduled collection day.	Every two weeks on scheduled dates.	No more than 1000 lbs. or cannot exceed 1 cubic yard in volume.	Fee based	Amendments have been made to chapter 8.5 and 22 of the Detroit City Code to allow for a warning system before the issuance of a ticket.	Information not available.	Collected through bulky item collection service.
Philadelphia	Set out compactable furniture, such as sofas for collection at curb side, up to two items per week. Mattresses and box springs must be bagged and sealed in plastic mattress bags when placed curbside. Items may be set out on a regular trash day.	Once a week	Up to two items per week.	Free for limited items.	Illegal dumping is a crime with a maximum fine of \$10,000, possible vehicle confiscation, and prison up to five years.	Drop off at sanitation convenience centers, or private haulers.	Not collected through bulky item collection service.
Jacksonville	Bulky items are collected on the same day as recycling. Bulky item collection varies by item type and area. Set out all items no later than 6 a.m. on collection day.	Every other week	Cannot exceed 40 pounds, or be longer than 5 feet.	No additional charge for residents who are receiving the city's collection and disposal service by paying the annual solid waste fee.	Information not available.	Donation, or find local recycle retailers.	Not collected through bulky item collection service.
Boston	Place items out at curbside for collection no later than 7:00 a.m. on the scheduled day.	Everyday	5 items per pick up.	Free service for residents.	Failure to comply with regulations will result in fines issued by the code enforcement division.	Donation, drop off sites, and call to make a special arrangement.	Collected through bulky item collection service.

Cities	Collection Method	Collection Schedule/Frequency	Bulky Item/White Good Limits	Collection Fees	Violations/Enforcement	Alternative Collection Services	White Good Collection
Milwaukee	Collection crews will target one zone each week and collect extra items left at the collection point on the scheduled collection day.	Once a week	One cubic yard	Free for limited items.	Violators face up to \$5,000 in fines or up to 100 days in jail.	Drop off center or special pick up request.	Not collected through bulky item collection service.
San Antonio	Residents will receive a City flier a week before bulky item collection in their area. Set out bulky items within 8 ft. of the curb, no later than 7a.m. on the scheduled day.	Twice a year	Bulky item piles are limited to eight cubic yards.	Provided to all City residential solid waste ratepayers.	Violators receive a fine up to \$2,000 a day, plus a fee for the collection and disposal of material.	Out of Cycle Collections, Free Landfill Day, Dial-A-Trailer, and other donation locations.	Collected through bulky item collection service.
Dallas	Residents are allowed to set out their brush and bulky items as early as the Thursday before their Brush and Bulk Week and as late as 7 a.m. the Monday of their Brush and Bulk Week.	Monthly	Information not available.	Fee based	Fine up to \$10,000; up to 2 years in jail.	Cost Plus service	Collected through bulky item collection service, excluding refrigerators
Fort Worth	Place bulky items on the curb by 7 a.m. on the Monday of your assigned week. Items may be placed on the curb as early as 6 p.m. the Friday before the assigned week. Crews have until the following Saturday at 5 p.m. to pick up bulky items.	Monthly	10 cubic yards	No charge up to 10 cubic yards; extra charge for piles exceeding 10 cubic yards.	Class B misdemeanor if the litter or other solid waste to which the offense applies weighs more than five pounds but less than 500 pounds or has a volume of more than five gallons but less than 100 cubic feet.	Drop off stations	Not collected through bulky item collection service.

Cities	Collection Method	Collection Schedule/Frequency	Bulky Item/White Good Limits	Collection Fees	Violations/Enforcement Code	Alternative Collection Services	White Good Collection
Austin	Place bulky items on the curb by 7 a.m. on the Monday of your assigned week. Items may be placed on the curb as early as 6 p.m. the Friday before the assigned week. Crews have until the following Saturday at 5 p.m. to pick up bulky items.	Twice a year	Passenger car tires limit of 8 per household, lawn mowers (no oil/gas), and railroad ties (cut it half).	Austin Resource Recovery provides bundled services that includes bulky collection service. Costs are based on the cart size (per-gallon).	Code enforcement pursues two goals with illegal dumping, which are ensuring the dump site is cleaned up and paying fines.	Several landfills for a fee.	Collected through bulky item collection service with doors removed.
Charlotte	Call to schedule a pick-up, placing all items close to the curb, 3 ft. away from all objects. Empty all appliances and remove any doors on the appliances. Place tape in the shape of an X across entire TV screen or any glass.	Schedule for pick up.	No limit	Free	\$50 fine plus cost of removal.	Donation drop off centers (e.g. Salvation Army, Goodwill, and etc.)	Collected through bulky item collection service.
El Paso	Residents must request a fee-based special pick-up, place the items by 7 a.m., items must not obstruct sidewalks, and items must be 5 feet away from the garbage or other obstructions.	Schedule for pick up.	Information not available.	Special pick up fees: \$35 for 5 cubic yards or less, \$7 for each additional cubic yard beyond the first 5 cubic yards plus tax.	It is unlawful to dispose of hazardous waste such as garbage, construction materials and used tires in vacant lots and other non-permitted areas.	City's Greater El Paso Landfill or one of the city's citizen collection stations.	Collected through bulky item collection service.
Memphis	Secure or remove appliance doors properly, place them at the curb by 7:00 a.m. on collection day. It is not necessary to call the city when placing these items at curbside. Allow up to 21 days while supervisors make arrangements for collection.	Pickup on regular residential trash collection days (weekly).	Information not available.	Monthly fee of \$25.05.	Violators are subject to a fine of not more than \$50. Each violation is considered a separate offense and is punishable.	Information not available.	Collected through bulky item collection service with doors removed.

Cities	Collection Method	Collection Schedule/Frequency	Bulky Item/White Good Limits	Collection Fees	Violations/Enforcement	Alternative Collection Services	White Good Collection
Washington DC	Call 311 to make an appointment. Place bulky items no earlier than 6:30 p.m. the day before and no later than 6:00 a.m. on the scheduled day. Place items where the trash is collected.	By appointment	Up to 7 items.	Free	Receive a sanitation violation ticket.	Drop off a small number of bulky items at the transfer station.	Collected through bulky item collection service.
Nashville-Davidson	All items must be placed at the curb or near the edge of the property. After this has been done, residents can call the number listed on the website to schedule their bulky pick up.	Schedule for pick up.	No limit	Free	Violators will receive a citation.	Recycling convenience centers	Collected through bulky item collection service.
Oklahoma City	Place items at your usual curbside refuse area, about an arm's length from the curb on your monthly scheduled day.	Monthly	Up to four cubic yards. Crews will pick up more, but will charge the resident's utility bill for each additional cubic yard.	No charge for the first four cubic yards. Additional charges will be applied for more than four cubic yards.	Violators will receive a fine up to \$500.	Free Landfill Day (twice a year)	Collected through bulky item collection service.
Baltimore	All items must be clearly marked "bulk collection," and placed at the same location as regular trash pickup.	Monthly by appointment.	3 items	Free	Illegal dumping is a misdemeanor and subject to maximum penalties of imprisonment for 30 days or a fine of \$1,500.	Citizen drop-off centers	Collected through bulky item collection service.

Source: Office of the City Auditor

Cities	Collection Method	Collection Schedule/ Frequency	Bulky Item/ White Good Limits	Collection Fees	Violations/ Enforcement	Alternative Collection Services	White Good Collection
<p>Louisville/ Jefferson</p>	<p>Place near but completely separate from your regular trash before 6 a. m. on Monday of your collection week. Bundle small items, and doors must be removed from large appliances.</p>	<p>3 times a year</p>	<p>Bagged items need to weigh below 60 pounds. Tree branches and brush limited up to 4 inches in diameter. No more than 4 tires per residence.</p>	<p>Free</p>	<p>Civil penalties from \$100 to \$1,000 per day applied to each violation as well as criminal prosecution and cost of clean-up.</p>	<p>Annual Junk and Bulky Waste Service</p>	<p>Collected through bulky item collection service with doors removed.</p>
<p>Albuquerque</p>	<p>Residents may schedule a large item pick up by dialing 311. Requests must be made at least 24 hours in advance.</p>	<p>Schedule for pick up.</p>	<p>No more than a standard pick-up truck load may be collected, excess charge thereafter may be applied.</p>	<p>Appliances and similar large items will be picked up free of charge. An excess charge thereafter may be applied.</p>	<p>The Solid Waste Rules under Prohibited Acts state that "no person shall dispose of any solid waste in a manner that a person knows or should know will harm the environment or endangers the public health, welfare or safety."</p>	<p>3 convenience centers</p>	<p>Collected through bulky item collection service.</p>

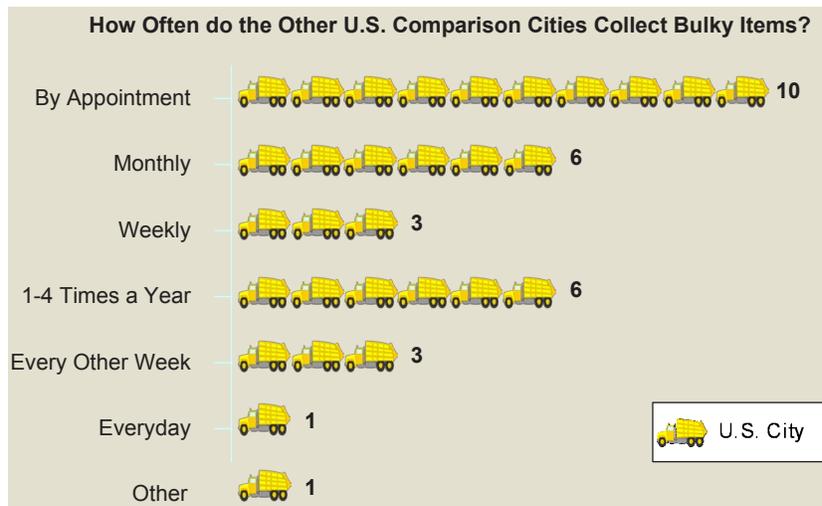
Source: Office of the City Auditor

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Appendix B

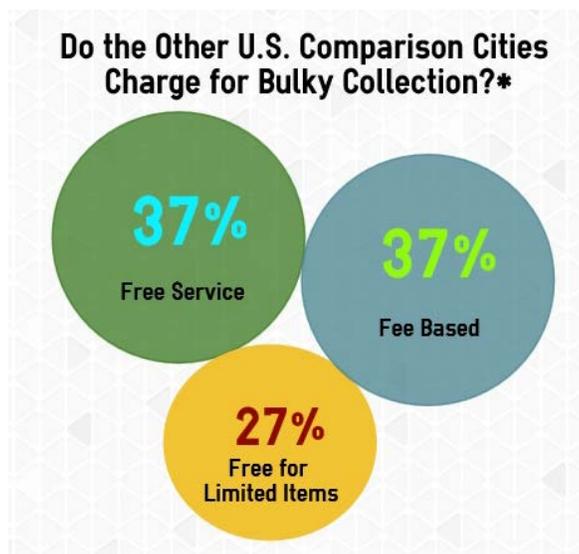
Comparison Cities – Bulky Collection Frequency and Fees

Exhibit B.1
Bulky Collection Frequency Among Other Cities



Source: Office of the City Auditor

Exhibit B.2
Bulky Collection Fees Among Other Cities



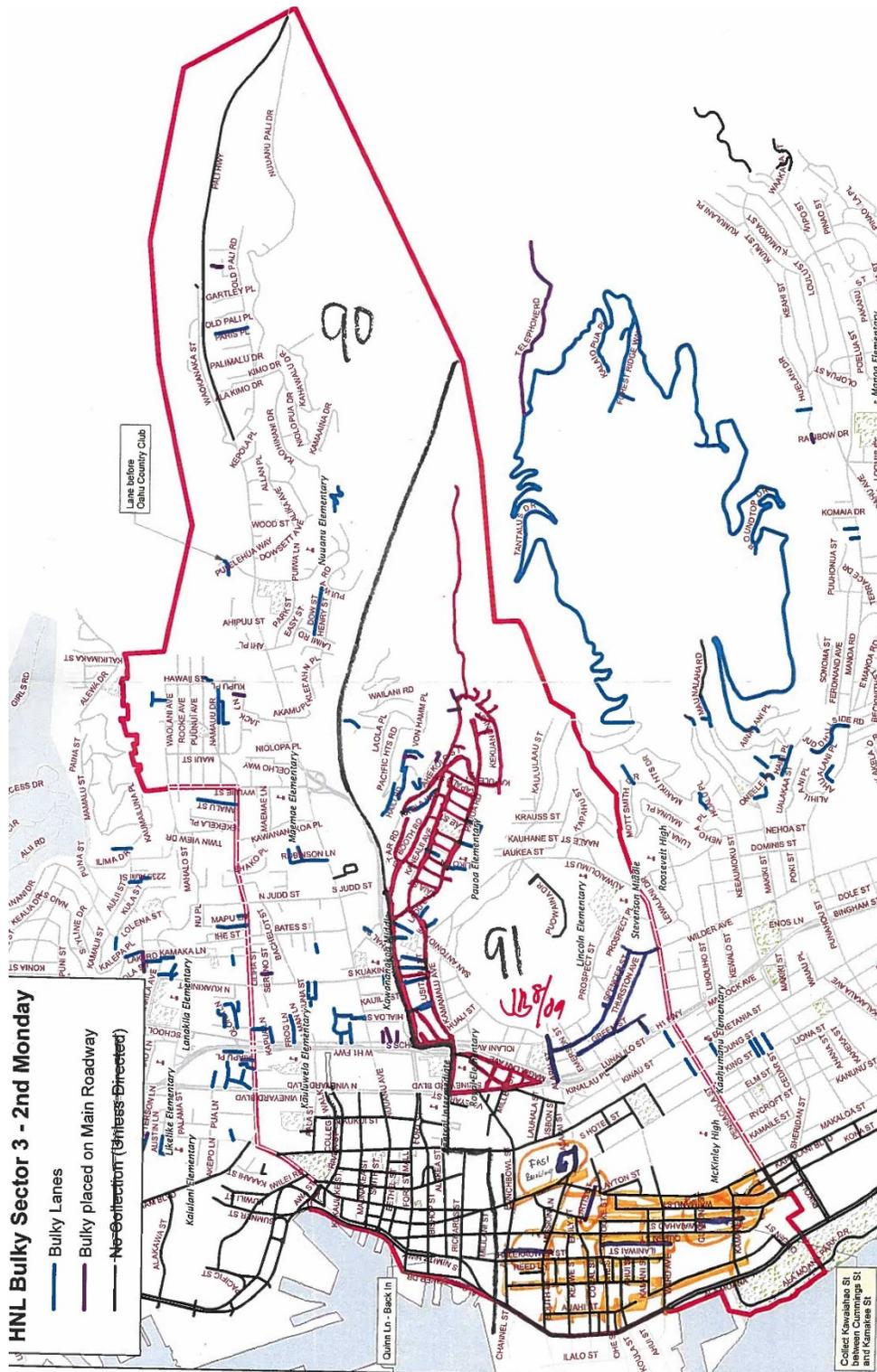
*Percentages do not total 100% due to rounding.

Source: Office of the City Auditor

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Appendix C

Sector Map Used by Crew Leaders at the Honolulu Yard to Mark Completed Routes

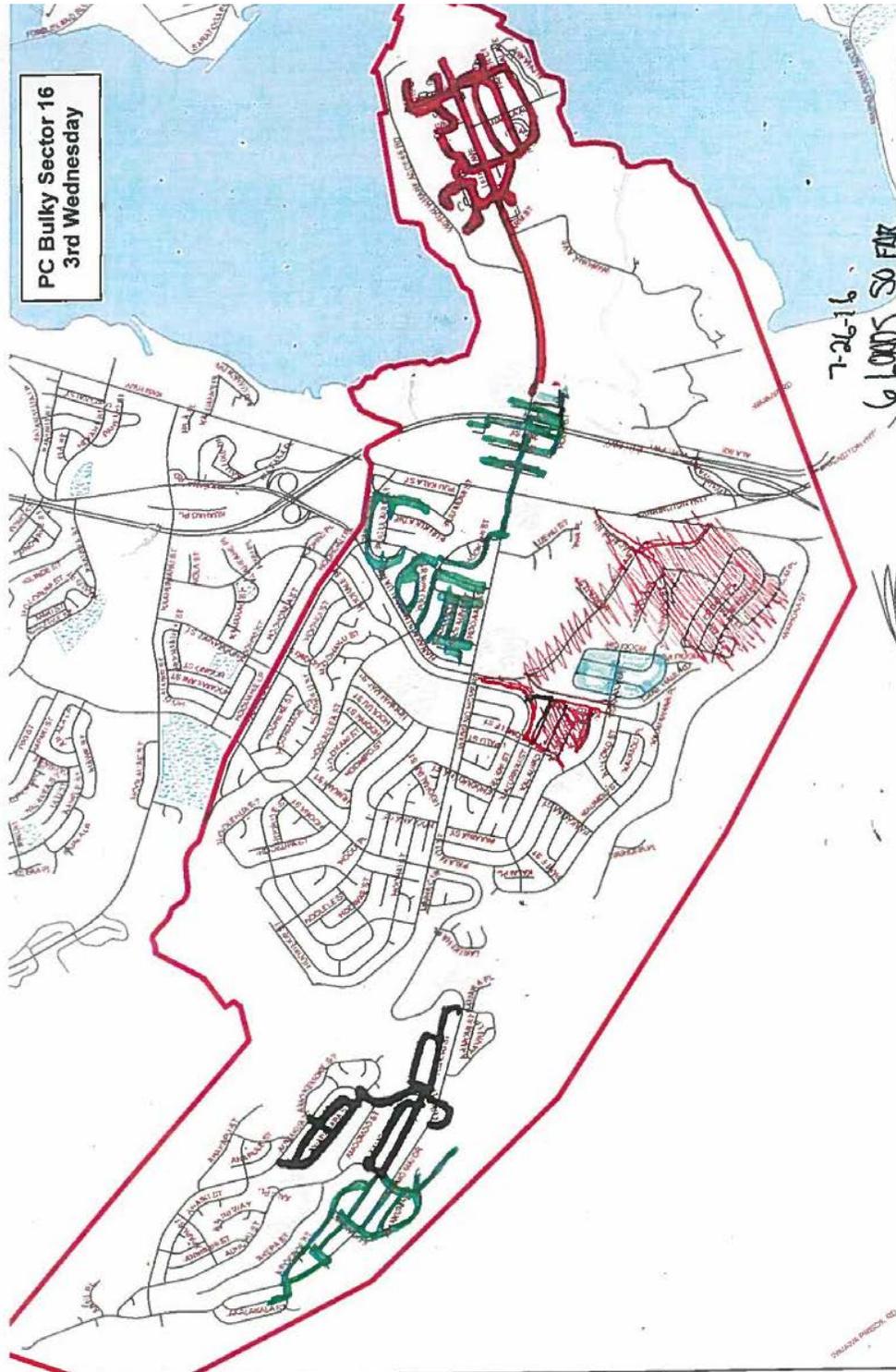


Source: Department of Environmental Services

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Appendix D

Sector Map Used by Crew Leaders at the Pearl City Yard to Mark Completed Routes



Source: Department of Environmental Services

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Appendix F

Notice of Violation



DEPARTMENT OF ENVIRONMENTAL SERVICES
CITY AND COUNTY OF HONOLULU
 REFUSE DIVISION
 1000 ULUOHIA STREET, SUITE 201, KAPOLEI, HAWAII 96707
 TELEPHONE: (808) 768-3401 • FAX: (808) 768-3434 • WEBSITE: www.opela.org

NOTICE OF VIOLATION

Date of Notice: **May 01, 2013**

Owner(s)
 Resident/Owner
 Address
 City, HI Zip Code

CERTIFIED MAIL NO.

Violation No.: 2013/Oct-NV905
 Violation Observed: 10/23/2013
 TMK: 21021015
 Specific Address of Violation: Address City, HI Zip Code

Violation(s) of the Revised Ordinance of Honolulu (ROH) are as follows:

<u>Section(s)</u>	<u>Violation(s)</u>	<u>Description(s)</u>
§9-1.4 (b)	<input type="checkbox"/> Premature setout of refuse	_____
	<input type="checkbox"/> Improper placement of refuse	_____
§9-1.4 (c)	<input type="checkbox"/> Refuse containers left curbside	_____
§9-1.4 (d)	<input type="checkbox"/> Premature setout of bulky items	_____
	<input type="checkbox"/> Improper placement of bulky item(s)	_____
§9-1.5 (a)	<input type="checkbox"/> Non-collectable item(s)	_____
§9-3.4 (b)	<input type="checkbox"/> No storage area for refuse	_____
§ _____	<input type="checkbox"/> _____	_____

Corrective Action(s): _____

You must correct all violations within **seven** calendar days from the date of notice. If no action is taken within the specified time:

1. A Notice of Order will be issued by the Department of Environmental Services (ENV) imposing CIVIL FINES for the specified violations; and/or
2. The items may be removed by City crews and you will be charged for the removal costs; and/or
3. This matter may be referred to the Prosecuting Attorney and/or Corporation Counsel for appropriate action.

Enclosed is a brochure with refuse collection information. Please call the undersigned should you have any questions.

Inspector: _____
 Inspector's Name Phone: 768-5220
 for the Director Department of Environmental Services

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Appendix G

Notice of Order

DEPARTMENT OF ENVIRONMENTAL SERVICES
CITY AND COUNTY OF HONOLULU
REFUSE DIVISION
1000 ULUOHIA STREET, SUITE 201, KAPOLEI, HAWAII 96707
TELEPHONE: (808) 788-3401 • FAX: (808) 788-3434 • WEBSITE: www.opala.org

KIRK CALDWELL
MAYOR



LORI M.K. KAHIKINA, P.E.
DIRECTOR

MANUEL S. LANUEVO, P.E., LEED AP
CHIEF

IN REPLY REFER TO

NOTICE OF ORDER

May 8, 2013

CERTIFIED MAIL NO.

NO.: 13/NOO-05-001

TO: Owner(s)
Resident/Owner
Address
City, HI Zip Code

Address of Violation: Address
City, HI Zip Code

Tax Map Key: 9-4-005-052

Description: Premature setout of bulky items (see attached NOV)

On or about DATE, the Department of Environmental Services (ENV) inspected the above described premise and observed (PROVIDE FACTS) and confirmed a violation of section (LIST SPECIFIC SECTION OR SECTIONS), Revised Ordinances of Honolulu ("ROH"). As a result, Notice of Violation (NOV) no. 13/NOV-05-001 was issued on May 1, 2013 (copy attached) and served upon NAME via certified mail (PROVIDE NUMBER). As the fee owner, leaseholder, sub-leaseholder, assignee, or tenant of the subject property, pursuant to ROH section (PROVIDE CITATION TO SPECIFIC ROH SECTION THAT ESTABLISHED RESPONSIBLE PARTY) and the City and County of Honolulu, Administrative Rules, section 13-1-24(b), you are the person responsible for the violation(s) cited above.

As of (STATE THE DATE), the violation referenced above and in NOV 13/NOV-05-001 has not been corrected. Consequently, you have continued to violate (SITE SECTIONS) despite ENV's notice to cease and desist. Pursuant to ROH section (SITE SPECIFIC ENFORCEMENT SECTION) and City and County of Honolulu,

Page 2

Administrative Rules, section 13-1-25, you are hereby ordered to:

1. Pay a fine of **\$250** by **May 15, 2013**, and
2. Correct the violation by **SPECIFICALLY STATING WHAT NEEDS TO BE DONE BASED UPON THE VIOLATION** by **May 15, 2013**. You are responsible for contacting the inspector, **Kevin Ito at (808) 768-5220**, to verify the corrective action. If you fail to complete this corrective action by May 15, 2013, in addition to any penalty authorized by law, including the aforementioned fine of \$250, you may also be assessed the cost to the City and County of Honolulu to remove the subject waste.

Checks (with the Notice of Order No. noted on it) are payable to the "City and County of Honolulu," and should be mailed to:

City and County of Honolulu, Refuse Division
1000 Uluohia Street, Suite 201
Kapolei, Hawaii 96707

If the fine is not paid and/or the violation is not corrected by the due date, this matter may be referred to the Department of the Corporation Counsel for civil prosecution and/or the Prosecuting Attorney's Office for criminal prosecution. Civil fines may be assessed in the amount of \$250.00 or \$500 (depending on the violation) for each violation, with each day of noncompliance after notification constituting a separate violation pursuant to ROH Section 9-5.1. The fine, if unpaid, may also be added to taxes, fees or charges collected by the City and County of Honolulu, such as your driver's license, vehicle registration, business license, and/or building permit. Further, the civil fine may be turned over to a collection service for further action.

If the order is issued to more than one person, each person shall be jointly and severally liable for the full amount of any fine imposed by the order.

This order shall become final on **May 15, 2013**. Within 30 days of receipt of this NOO, you may appeal the provision of the order by submitting a written petition for appeal to ENV at the above referenced address. Copies of the City and County of Honolulu, Administrative Rules, Department of Environmental Service, Rules of Practice and Procedure, which include the rules applicable to appeals are available on the ENV website at <http://www1.honolulu.gov/env/> (ENV Administrative Rules), at the ENV offices, 1000 Uluohia Street, Suite 308; Kapolei, Hawaii 96707, or the Office of City Clerk, 530 South King Street, Room 100; Honolulu, Hawaii 96813.

Should you have any questions regarding this order, please contact our Refuse Inspection Office at (808) 768-5220

Lori M.K. Kahikina, P.E.
Director

Attach: 2013/May-NV905
cc: Inspector, Refuse Division,
Collections Branch