Appendix E
AIRPORT RECYCLING, REUSE, AND WASTE REDUCTION

The primary objective of the Airport Recycling, Reuse and Waste Reduction section is to provide the City of Corpus Christi and its airport administration with recommendations for future improvements and processes that promote suitable principles in addressing airport operations and aviation demand. By making sustainability a priority in the planning process and identifying best management practices, the airport can become a more environmentally friendly economic hub.

REGULATORY GUIDELINES

FAA Modernization and Reform Act of 2012

The *FAA Modernization and Reform Act of 2012* (FMRA), which amended Title 49 United States Code (USC), included several changes to the Airport Improvement Program (AIP). Two of these changes are related to recycling, reuse, and waste reduction at airports:

- Section 132(b) of the FMRA expanded the definition of airport planning to include "developing a plan for recycling and minimizing the generation of airport solid waste, consistent with applicable State and local recycling laws, including cost of a waste audit."

- Section 133 of the FMRA added a provision requiring any airport that has or plans to prepare an ALP narrative report and receives AIP funding for an eligible project, to ensure the new or updated master plan addresses issues related to solid waste recycling at the airport, including the following:

    - The feasibility of solid waste recycling at the airport
    - Minimizing the generation of solid waste at the airport
    - Operation and maintenance requirements
    - A review of waste management contracts
    - The potential for cost savings or generation of income

State of Texas Solid Waste Management

The *Texas Administrative Code*, Title 30, Part 1, Chapter 330, *Municipal Solid Waste*,[1] was adopted to regulate waste management. This document provides policy and procedural guidance to state, substate, and local agencies on the proper management of solid waste and outlines sound methods of solid waste management and disposal for state, substate, and local agencies.

The Texas Commission on Environmental Quality (TCEQ) oversees the state's solid waste management implementation.[2] The Land Department in the TCEQ overviews waste management, recycling, reducing, reusing, and cleanups and remediation. Duties assigned to the Land Department include overseeing the following:

- Processing, storing, transporting, and disposing of waste
- Permits, registrations, and compliance
- Household, industrial, municipal, and radioactive waste
- Septic systems, sludge, dredge, and injection

Duties assigned to the recycling, reducing, and reusing office include overseeing the following:

- Recycling operations and composting
- Home and business resources
- Fats, oils, and grease, automotive waste, and electronic waste
- Exchange network for business and industry

City of Corpus Christi Solid Waste Management

At a citywide level, Corpus Christi has a Solid Waste Services Department that oversees and provides a system for the collection and transportation of municipal solid waste for residential and commercial users. Trash is collected once a week and ultimately ends up at one of three city landfills and collection centers: J.C. Elliott Transfer Station, Republic Services, and Cefe Valenzuela Landfill.[3]

The department also offers recycling services and educational tools. The city's recycling program, Recycle RIGHT, promotes the refinement of recycling habitats through education of and outreach to city residents. Tools, such as recycling presentations to various organizations and the CC Recycles app,[4] have been created to aid Recycle RIGHT's program. The ultimate goal of this program is to reduce the amount of trash that ends up in recycling bins.

[1] Texas Administrative Code (https://texreg.sos.state.tx.us/public/readtac$ext.TacPage?sl=R&app=9&p_dir=&p_rloc=&p_tloc=&p_ploc=&pg=1&p_tac=&ti=30&pt=1&ch=330&rl=103), accessed March 2025

[2] Texas Commission on Environmental Quality, Land, Permitting and Managing Waste Disposal, Cleanups, and Other Land-Based Activities (https://www.tceq.texas.gov/agency/land_main.html)

[3] City of Corpus Christi, Solid Waste Services (https://www.corpuschristitx.gov/department-directory/solid-waste-services/landfill-and-collection-centers/), accessed March 2025

[4] The CC Recycles App is an app designed by the City of Corpus Christi to educate members of the public on what can and cannot go into the city's recycling bins. The app also outlines the local trash and recycling schedule.

SOLID WASTE

Airport sponsors typically have purview over waste-handling services in facilities they own and operate, such as passenger terminal buildings, hangars, aircraft rescue and firefighting (ARFF) stations, and maintenance facilities. Tenants of airport-owned buildings/hangars or tenants that own their facilities are typically responsible for coordinating their own waste-handling services.

For airports, waste can generally be divided into eight categories:[5]

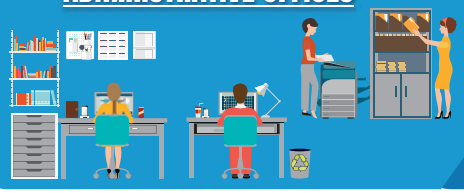
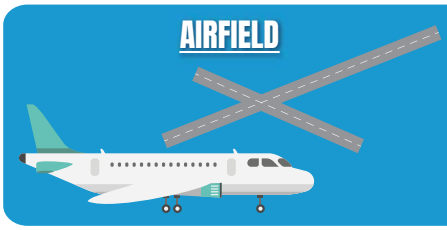
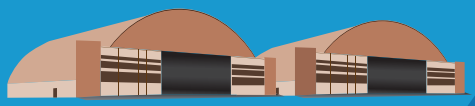
- **Municipal solid waste** (MSW) is more commonly known as trash or garbage and consists of everyday items that are used and then discarded, such as product packaging.
- **Construction and demolition** (C&D) waste is considered non-hazardous trash resulting from land clearing, excavation, demolition, and renovation or repair of structures, roads, and utilities. C&D waste includes concrete, wood, metals, drywall, carpet, plastic, pipe, cardboard, and salvaged building components. C&D is also generally labeled MSW.
- **Green waste** is a form of MSW yard waste that consists of tree, shrub, and glass clippings, leaves, weeds, small branches, seeds, and pods.
- **Food waste** includes unconsumed food products or waste generated and discarded during food preparation and is also considered MSW.
- **Deplaned waste** is waste removed from passenger aircraft. Deplaned waste includes bottles, cans, mixed paper (i.e., newspapers, napkins, and paper towels), plastic cups, service ware, food waste, and food-soiled paper/packaging.
- **Lavatory waste** is a special waste that is emptied through a hose and pumped into a lavatory service vehicle. The waste is then transported to a triturator[6] facility for pretreatment prior to discharge in a sanitary sewage system. Chemicals in lavatory waste can present environmental and human health risks if mishandled; therefore, caution must be taken to ensure lavatory waste is not released to the public sanitary sewage system prior to pretreatment.
- **Spill clean and remediation wastes** are special wastes that are generated during cleanup of spills and/or remediation of contamination from several types of sites on an airport.
- **Hazardous wastes** are governed by the *Resource Conservation and Recovery Act* (RCRA) and the regulations in Title 40 Code of Federal Regulations (CFR) Subtitle C, Parts 260 to 270. The U.S. Environmental Protection Agency (EPA) has developed less stringent regulations for certain hazardous waste (universal waste), which are described in 40 CFR Part 237, the *Universal Waste Rule.*

As shown on **Exhibit E1**, there are multiple areas where the airport potentially contributes to the waste stream, including the passenger terminal building, on-airport tenants (fixed base operators [FBOs], and airport construction projects. To create a comprehensive waste reduction and recycling plan for the airport, all potential inputs must be considered.

[5] FAA, Recycling, Reuse and Waste Reduction at Airports, April 24, 2013

[6] A triturator turns lavatory waste into fine particulates for further processing.

AIRPORT WASTE STREAMS

AIRPORT AREA	POTENTIAL INPUTS	POTENTIAL OUTPUTS
TERMINAL 	Restaurants Shops Passengers Employees	Food Waste, Paper, Plastic, Aluminum Cans, Trash, Grease & Oil, Green Waste, Deplaned Waste
ADMINISTRATIVE OFFICES 	Employees	Food Waste, Paper, Plastic, Aluminum Cans, Trash
AIRFIELD 	Aircraft Operations	Runway Rubber, Green Waste
FLIGHT KITCHENS 	Aircraft Food Services	Food Waste, Waste Water, Plastic
HANGARS 	Goods Movements	Plastic, Wood, Vehicle Waste (Tires & Fluids)
AIRPORT TRAFFIC CONTROL TOWER 	Employees	Paper, Trash, Aluminum Cans
AIRPORT CONSTRUCTION 	Construction Re-Construction Demolition	Reused Concrete, Reused Asphalt, Vehicle Waste, Soils, Building Materials, Wood, General Waste

Source: Recycling, Reuse, and Waste Reduction at Airports, FAA (April 24, 2013)

EXISTING SERVICES

A facility walkthrough was conducted in spring 2025 to discuss existing waste management practices at the airport with airport personnel and available tenants. The walkthrough included a tour of the passenger terminal building, CRP's two FBOs, and the U.S. Coast Guard facility at the airport. For this recycling plan, waste management practices will be split into two primary areas: facilities that contract directly with the airport and adhere to city guidance, and facilities/tenants that manage and collect their own waste.

Airport-Controlled Waste Management Practices

The City of Corpus Christi manages solid waste through waste/recycling receptacles placed throughout the terminal that are emptied routinely by the janitorial staff into four eight-cubic-yard dumpsters and one 12-cubic-yard dumpster. The recyclables and other solid waste are collected and picked up by Frontier Waste Solutions once per week. The following areas streamline their respective waste into the airport's recycling bins:

- Terminal
- Car rental quick turnaround (QTA) facility
- Airfield

The airport recycles and adheres to city guidelines by recycling the items summarized and outlined on **Exhibit E2**. In the terminal building, eight recycling bins are located on the public-facing side and four recycling bins are placed on the secured side of the terminal. Each recycling bin is paired with a waste bin, as depicted in **Figure 1**. In addition to the combined trash and recycling bins located throughout the public-facing areas of the terminal, singular trash bins are located in the terminal (see **Figure 2**).

There are also recycling bins in the administrative offices and breakroom that allow for the collection of paper (see **Figure 3**). These bins are collected by janitorial staff and ultimately placed in a 12-cubic-yard recycling bin that is collected as needed. Food concessionaries within the passenger terminal area do not currently recycle or compost food scraps and instead manage their waste through a combination of bins for solid waste and a grease trap that captures fats, oils, and grease from the kitchen. Grease is collected from the Tailwinds Concessions grease trap twice per month.

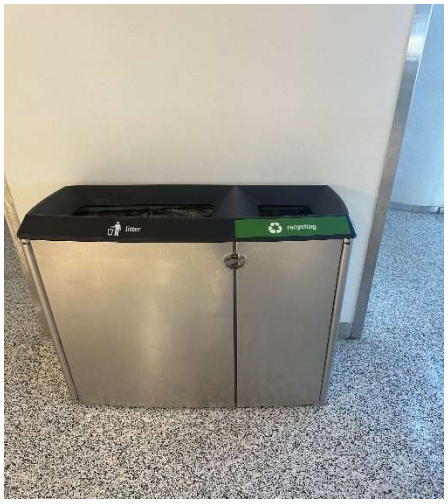


Figure 1: Waste / Recycling Receptacle in Terminal Building

Figure 2: Waste Receptacle in Terminal Building

RECYCLABLE ITEMS

Paper

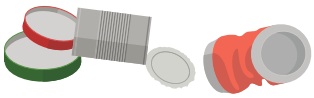
- Junk Mail
- Newspapers
- Office Papers
- School Papers
- Magazines
- Catalogs
- Paperback books
- Cardboard Boxes
- Food Boxes

Paper and Cardboard materials must be emptied, dry, and flattened with packaging materials removed.

Metal

- Aluminum Cans/Bottles
- Steel Cans
- Metal Lids

Cans must be empty and rinsed



Plastic

- Beverage Bottles
- Detergent Bottles
- Soap Bottles
- Shampoo Bottles
- Milk Jugs
- Butter Tubs
- Sour Cream Tubs
- Yogurt Tubs

Plastics must be emptied and rinsed. Remove bottle caps and toss them in the trash. The following plastics are accepted:

NON-RECYCLABLE ITEMS

Glass
Bottles & Jars, Light Bulbs, Mirrors, Windows

Ceramics
Dishes, Bakeware, Pottery, Figurines

Aluminum Foil
Aluminum Pans, Wrappers, Dirty Foil, Sauce Packets

Styrofoam
Plates, Cups, Packaging, egg cartons

Hoses/Cords
Electrical Cords, Ribbon, String Lights, Rope

Hazardous Waste
Pesticides, Antifreeze, Paint, Batteries, Motor Oil & Fuel

Electronics
Cables, Tablets, Cell Phones, TVs & Monitors

Yard Waste
Leaves, Grass Clippings, Branches, Bushes

Pizza Boxes Etc.
Paper Plates/Cups, Take-Out Boxes, Paper Napkins/Towels

Plastic
Bags, Hangars, Lunch Baggies, Plastic Wrap/Film

Drink Cartons
Milk, Juice, Soup, Ice Cream, Wine

Fabric
Bedding, Curtains, Clothing, Towels, Belts

Misc.
Diapers, Medications, Pet Training Pads, Toilet Paper, Syringes, Pots, Pans

Source: Corpus Christi, TX, Solid Waste Services, 2024 Solid Waste Services Customer Guide

Other waste streams included in airport-controlled waste management areas include electronic and hazardous waste. Electronic waste (e-waste) collected by the airport is taken to the city's Information Technology (IT) Department for recycling. Hazardous waste is collected on an on-demand basis and is taken to various areas, depending on the type of waste. For example, antifreeze and oil are taken to H&H Oil and batteries are collected and taken to Advance Auto Parts.

Figure 3 – Recycling and Trash Bins in the Terminal Administrative Area

Tenant Waste Management Practices

Tenants at the airport are responsible for overseeing their own solid waste. Information regarding waste management was collected from the following tenants:

- Sterling Air – FBO
- Atlantic Aviation – FBO
- U.S. Coast Guard

Currently, no MSW recycling practices are enacted within Sterling Air's FBO building. Per regulations, hazardous waste related to aircraft maintenance and operations is recycled on an on-demand basis. Batteries are sent to a local facility for recycling and aircraft tires are either retreaded or sent to a local landfill for proper waste disposal.

Atlantic Aviation currently recycles paper-based materials within the FBO building. There are two recycling bins located within the FBO: one bin on the second floor and one bin on the first floor. All plastic waste (e.g., plastic bottles, food wrappers, straws, etc.) are thrown in the waste bin.

The U.S. Coast Guard utilizes two large bins outside its facility to collect and manage its waste streams; one bin is dedicated for non-recyclable waste and one is for collection of cardboard for recycling. No paper or plastic is collected for recycling. Similar to the two FBOs, hazardous waste is recycled and collected on an on-demand basis, which equates to a pick-up approximately every three months. The U.S. Coast Guard utilizes 55-gallon barrels to store hazardous waste, as depicted in **Figure 4**. The following items are stored and collected within these barrels:

- Oil rags
- Ceiling compound debris
- Paints
- Gasoline

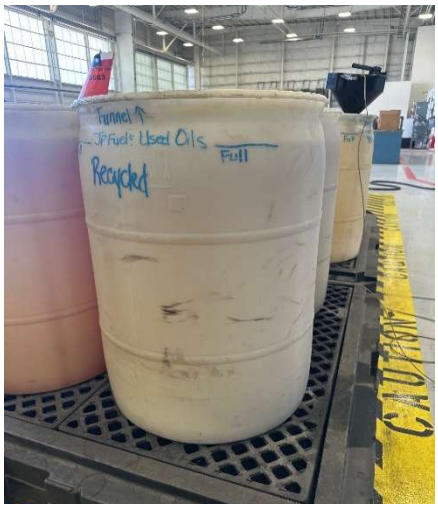


Figure 4 – 55-gallon hazardous waste barrel in the Coast Guard Facility

Other waste streams that are collected and recycled on a yearly basis include:

- Tires
- Aluminum cans (on a voluntary collection and pick-up basis from employees)
- Aerosol cans (unpunctured)
- Lithium batteries

A kitchen facility situated in the U.S. Coast Guard facility contains a 62-gallon grease trap and a 62-gallon oil and water separator.

FAA Airport Traffic Control Tower (ATCT)

The FAA ATCT currently engages in recycling practices. Recycling bins are placed within the tower for collection of cardboard and paper materials. As previously noted, materials accepted for recycling by the City of Corpus Christi are depicted on **Exhibit E2**.

SOLID WASTE MANAGEMENT SYSTEM

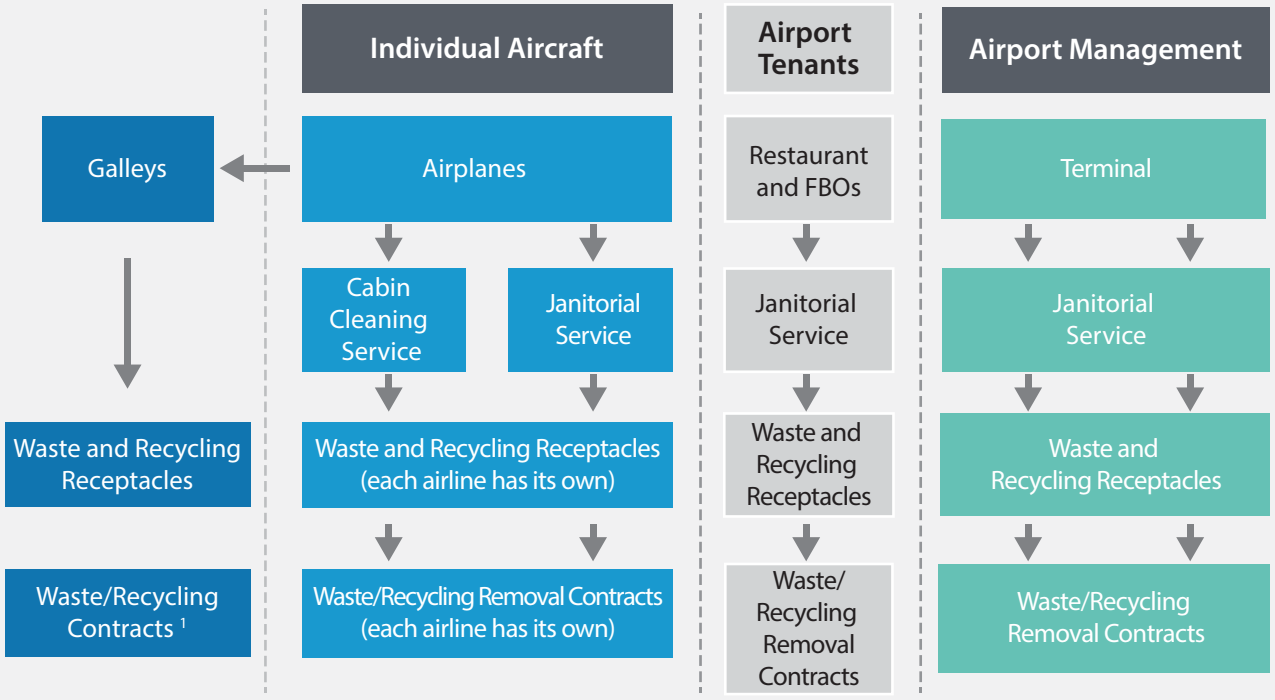
Airports generally utilize either a centralized or a decentralized waste management system. The differences between the two methods are described below and summarized on **Exhibit E3**.

- **Centralized waste management system** | With a centralized management system, the airport provides receptables for the collection of waste, recyclable materials, and/or compostable materials and contracts for their removal by a single local provider.[7] The centralized waste management system allows for more participation from airport tenants who may not be incentivized to recycle on their own and can reduce the overall cost of service for all involved. A centralized strategy can be inefficient for some airports because it requires more effort and oversight on the part of airport management; however, the centralized system is advantageous because it involves fewer working components in the overall management system of solid waste and recycling efforts. It also allows greater control by the airport sponsor over the type(s), placement, and maintenance of dumpsters, thereby saving space and eliminating the need for tenants to have individual containers.

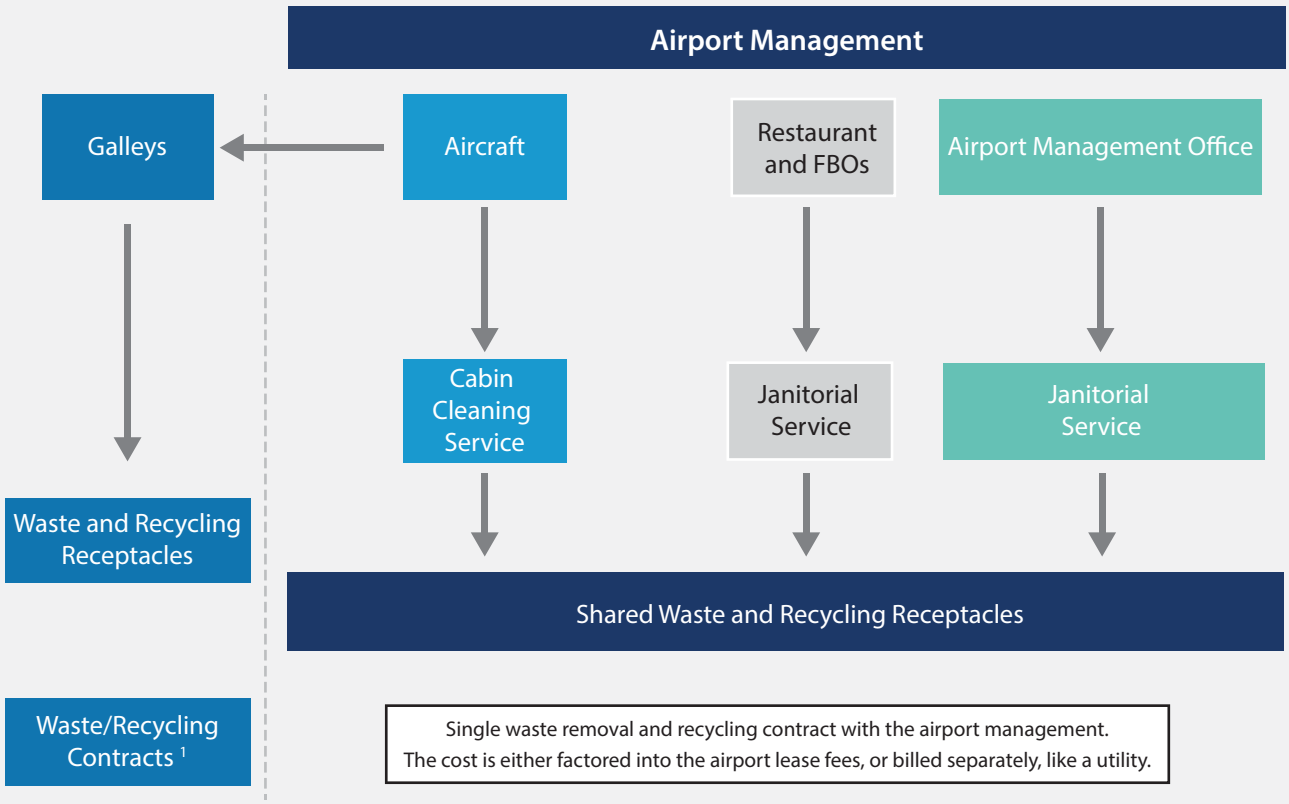
- **Decentralized waste management** | Under a decentralized waste management system, the airport provides waste containers and contracts for the hauling of waste materials in airport-operated spaces only; however, airport tenants (such as FBOs, retail shops, and others) manage the waste from their leased spaces with separate contracts, billing, and hauling schedules. A decentralized waste management system can increase the number of receptables on airport property and the number of trips by a waste collection service provider if tenants' and the airport's collection schedules differ.

[7] National Academies of Science, Engineering, and Medicine, Airport Cooperative Research Program, Synthesis 92, Airport Waste Management and Recycling Practices, 2018

Components of a Decentralized Airport Waste Management System



Components of a Centralized Airport Waste Management System



[1] Galleys usually manage their own waste even if an airport relies on a centralized system

Source: Natural Resources Defense Council, Trash Landings: How Airlines and Airports Can Clean Up Their Recycling Programs, December 2006.

As described under **Existing Services** above, CRP currently operates under a decentralized system for solid and hazardous waste recycling.

GOALS AND RECOMMENDATIONS

Solid Waste and Recycling Goals

Table E1 outlines objectives that could help reduce waste generation and introduce additional recycling efforts at the airport. To increase the effectiveness of tracking the progress of waste management and recycling goals at the airport, a set of key performance indicators (KPIs) have been created. A positive KPI trend toward the overall goal indicates the specific initiatives that have been implemented are producing desired results; however, if KPIs trend negatively, this is an indication that CRP may need to reevaluate the goals outlined below.

TABLE E1 | Waste Management and Recycling Goals at Corpus Christi International Airport

Goal 1: Reduce the amount of solid waste generated.	
Targets	**Key Performance Indicators**
• Conduct quarterly waste audits • Eliminate the purchase of items that are not recyclable (e.g., Styrofoam, plastic bags)	• Decrease in the weight (tons) of solid waste • Number of waste streams that participate in green purchasing practices
Goal 2: Increase the amount of materials recycled at CRP.	
Targets	**Key Performance Indicators**
• Reuse cardboard boxes for storage • Promote the expansion of recycling services to all areas of the airport (e.g., concessions, tenants, etc.) • Enhance recycling efforts through signage in public-facing areas of the terminal • Require contractors to implement strategies to reduce, reuse, and recycle construction and demolition (C&D) waste • Improve waste and recycling tracking and data management	• Increase in the number of businesses, tenants, and other areas that enforce a recycling program or programs for their respective waste operations • Increase in the number of promotional efforts to increase recycling in areas that currently recycle (e.g., the introduction of signage near existing recycling bins)
Goal 3: Introduce composting efforts.[1]	
Targets	**Key Performance Indicators**
• Collect grass clippings from the airfield and other areas that are regularly mowed at CRP • Place bins in restrooms that specifically collect paper towels for composting • Compost food scraps in areas of the airport that may contain kitchens (e.g., concession areas and breakout rooms in the terminal building and tenant buildings)	• Amount of waste diverted from the landfill through composting • Number of areas in the airport committing to and enforcing composting practices in their overall waste management system(s)
Goal 4: Establish construction and demolition goals.	
Targets	**Key Performance Indicators**
• Create a construction waste management (CWM) plan • Include recycling requirements in all contracts, subcontracts, and purchase orders	• Increase in percentage for the waste diversion rate (i.e., the percentage of waste diverted from the landfill through recycling, composting, or other recovery methods) • Decrease in waste disposal costs for construction projects

[1]The City of Corpus Christi is actively working toward constructing a composting facility next to the Cefe Valenzuela Landfill. Once a city composting facility is operational, the airport should consider sending compostable waste streams that are unable to be recycled to this facility.

Recommendations

To maximize waste reduction and introduce recycling efforts at the airport, the following recommendations have been made to achieve the goals outlined in **Table 5A**.

Goal 1: Reduce the amount of solid waste generated.

- **Create a centralized waste management at the airport.** Currently, CRP participates in a decentralized waste management system because airport tenants are responsible for overseeing their own waste management. Airport staff could consider engaging tenants to create a centralized waste management system at the airport to streamline waste management efforts at CRP.
    - **Considerations:**
        - Any lease agreements that are up for renewal should be reviewed/revised to include language that would require tenants to enact recycling practices.
        - Implementation of incentives for FBOs and other tenants to either enhance existing recycling practices or join the airport's recycling program should be considered.

- **Assign the responsibility of waste management to a dedicated individual or group.** Having one person or a group of people oversee and manage solid waste and recycling at the airport would create efficient and cost-saving solid waste management solutions. People dedicated to this operational aspect of the airport would gain familiarity with waste processes and could help identify areas of improvement and cost-saving measures.

- **Provide education for airport employees.** To minimize waste within the airport, it is crucial to inform airport employees and provide them with a thorough education on waste management at both individual and group levels. As part of the onboarding process, new employees should be given the tools needed to achieve a thorough understanding of the airport's solid waste goals. Currently, the city's Solid Waste Department offers opportunities for members of this department to help various community members and organizations learn more about recycling at a citywide level through informed presentations and exhibitions.[8]

- **Audit the current waste management system.** The continuation of an effective program requires accurate data on current waste rates. An airport can gain insight into its waste stream in several ways, such as requesting weights from the hauler, tracking the volume, or reviewing the bills; however, managing the waste system starts with a waste audit, which is an analysis of the types of waste produced. A waste audit is the most comprehensive and intensive way to assess waste stream composition, opportunities for waste reduction, and capture of recyclables and should include the following actions:
    - Examination of records
        - Evaluate waste hauling and disposal records and contracts

[8] City of Corpus Christi, Recycling Presentations https://www.corpuschristitx.gov/department-directory/solid-waste-services/special-programs/recycling-presentations/, accessed March 2025

        - Examine supply and equipment invoices
        - Identify other waste management costs (commodity rebates, container costs, etc.)
        - Track waste from the point of origin
        - Establish a baseline for metrics
    - Facility walkthrough conducted by the airport
        - Gather qualitative waste information to determine major waste components and waste-generating processes
        - Identify the locations on the airport that generate waste
        - Identify what types of waste are generated by the airport to determine what can be reduced, reused, or recycled
        - Improve understanding of waste pick-up and hauling practices
    - Waste sort
        - Provides quantitative data on total airport waste generation

- **Create a tracking and reporting system.** Track solid waste generated to allow the airport to identify areas where a significant amount of waste is generated, which will help the airport estimate annual waste volumes. Understanding the cyclical nature of waste generation will allow the airport to estimate costs and will identify areas of improvement.

Goal 2: Increase Number of Materials Recycled at CRP

- **Enhance the existing recycling program at the airport.** To guarantee the airport continues to reduce the amount of waste hauled to the landfill, materials that cannot be reused or avoided should be recycled, if possible. The city should review internal procedures to ensure there are no unacceptable items contaminating recycling containers or recyclables thrown in the trash.

  One area that could be enhanced within CRP's terminal facility is recycling signage. Recycling bins currently situated throughout the terminal building lack signage to indicate what materials are allowed within the receptacles. Clearly marked signage of what is and is not accepted should be placed near solid waste and recycling containers, as depicted in **Figure 5**.

Figure 5: Mock-up of Waste/Recycling Signage Above a Collection Bin in CRP's Terminal

- **Reduce waste through controlled purchasing practices and the consumption of nonessential products.** The airport can control the amount of waste generated by prioritizing the purchase of items or supplies that are reusable, recyclable, compostable, or made from recycled materials.

- **Provide tenant education.** It is crucial to encourage tenant participation to ensure buy-in of any future recycling efforts that may be undertaken at CRP. To ensure recycling is part of the airport's everyday business, airport administration should provide training and education to support personnel, tenants, and others who conduct business at the airport. In-person meetings with airport tenants could be held to create mutual understanding of the airport's solid waste and recycling goals and how tenants play a vital role in the airport's overall success.

Goal 3: Introduce Composting Efforts

- **Create a compost program at CRP.** To guarantee as much waste is collected and diverted from the landfill as possible, the airport should consider creating a composting program to decrease the amount of waste sent to local landfills. Considerations when starting a new composting program include the following:
    - Purchase compostable friendly materials for various waste streams.
    - Identify the amount of compostable waste that may be collected. This will aid in purchasing the correct number and size(s) of compost bins that may be needed for the initial composting program. This information can be collected during an annual waste audit.
    - Involve employees and tenants early in the process of adding composting to the airport's recycling program to ensure various stakeholders at CRP have a thorough understanding of what composting is/isn't and what organic items can be composted.

Goal 4: Establish Construction and Demolition Goals

- **Implement construction waste requirements in contracts for construction projects.** Contracts should highlight ways to repurpose and reuse materials/salvage and explain how recyclable materials are defined in the construction process. Additionally, contracts should establish standards and specifications in the procurement process and contracting when starting a new construction project at CRP. Other action items to consider when drafting a contract for a construction project include preparing a construction waste management (CWM) plan, assigning a waste management coordinator, and tracking and reporting requirements under the CWM plan.

- **Create a CWM Plan.** Have the airport and its contractors adopt a CWM plan when applicable. A typical CWM plan should encompass goals and strategies to manage a project's C&D waste. A CWM should also identify the types and quantities by weight for any proposed demolition, site clearing, and/or construction waste that may be generated by the project.

  Other items to include in a CWM plan include the following:

    - Complete a materials handling estimate worksheet for all applicable project waste streams.
    - Identify where recyclable materials storage and collection points will be situated.
    - Create a plan to communicate recycling goals with employees and subcontractors.

- Create a waste reduction work plan to identify what materials can be salvaged or recycled, how waste is disposed of, and the method for collecting and transporting waste streams.

The construction waste management plan should consider the following construction and demolition debris for recycling or reuse:	
• Earth, soil, dirt • Concrete reclaimed asphalt pavement • Bricks/masonry (cinder blocks, mortar, etc.) • Rock, stone, gravel • Ferrous metal (iron, steel, etc.) • Nonferrous metal (aluminum, copper, etc.) • Roofing shingles and other roof materials • Cardboard, paper, packaging	• Sand • Wood • Gypsum drywall • Plastics • Plaster • Paint • Plumbing fixtures and piping • Land-clearing debris • Non-asbestos insulation

At the end of each project, as part of the CWM plan, documentation that includes tracking, reporting, and invoicing should also be submitted to demonstrate which CWM plan goals were met.