

you produce over 3,100 gallons/yr you are captured by SB 14.)

INTRODUCTION:

If you routinely produce more than 12,000 kg/yr (about 13.2 tons) of hazardous waste or 12 kg/yr of extremely hazardous waste the Hazardous Waste Source Reduction and Management Review Act of 1989 (SB 14) [Health and Safety Code Section 25244.12 et. seq.] requires you to identify your major hazardous waste streams, evaluate source reduction opportunities, and prepare plans and reports to document these efforts. These plans are required to be prepared once every four years. The next plans and reports must be completed by September 1, 1999.

There have been several important legislative changes to this law since the last plans were prepared in 1995. We encourage you to read this brochure to determine how the recent amendments affect you. If you have questions or need assistance, please feel free to contact the Department of Toxic Substances Control (see "Where to Get Help" at the end of this brochure).

WHO IS AFFECTED?

To determine if your business must comply with the source reduction planning requirements ask yourself the following questions?

- 1) Did my facility generate 12,000 kg/yr or more of hazardous waste or 12 kg/yr or more of extremely hazardous waste in 1998?
- 2) Is this waste routinely generated from ongoing operations? (One-time waste streams such as excavated soils from site clean up are excluded.)
- 3) Does my business generate aqueous hazardous waste that undergoes on-site treatment prior to discharge to the sewer? (If

If you answer yes to questions 1 and 2, or to question 3, you are subject to the SB 14 planning requirements. If you are unsure whether your facility is required to prepare documents please contact the department.

WASTE STREAM EXEMPTIONS:

The Department has identified several waste streams that are exempt from the planning requirements. These waste streams include household hazardous waste, motor vehicle fluids and filters, batteries, infectious waste, asbestos, PCBs, site mitigation wastes, demolition wastes, and wastes resulting from laboratory scale research activities.

WHAT IS HAZARDOUS WASTE SOURCE REDUCTION?

Hazardous waste source reduction is any action which causes a net reduction in the generation of waste or that results in a lessening of the properties that cause the waste to be classified as hazardous. Source reduction occurs BEFORE a waste is generated. Examples of source reduction include:

- ~ input changes - changes in raw materials or feedstocks
- ~ operational improvements - strategies to improve handling and management
- ~ production process changes - changes in manufacturing methods or techniques, equipment modifications, or changes in operating conditions
- ~ product reformulation - changes in the design, composition or specification of final and intermediate products
- ~ administrative changes - includes inventory control, employee training, or waste minimization policies

Source reduction is not treatment or actions which

merely concentrate the constituents of a hazardous waste after it is generated, or that merely transfer the pollutant or risk to another environmental medium (i.e., burning a hazardous waste instead of burying it shifts the pollutants from land to air).

WHAT IS REQUIRED?

Generators subject to SB 14 must evaluate source reduction alternatives, set goals and document the results in a plan. The plan covers the next 4 years, i.e., up through 2002. Generators must also document their accomplishments for the last 4 years, i.e., compare 1994 to 1998. This retrospective report should include discussions on recycling and treatment as well as source reduction. The plan and report may be combined into a single document. [Note: there is also a checklist option available for generators meeting the Gov. Code definition of a "small business" .

The third requirement is to complete a summary progress report and submit this to the department before September 1, 1998. The other two documents are kept on site and must be made available to inspectors upon request.

WHAT'S IN A PLAN?

- * Name, address and EPA ID #
- * A description of the type of business, operations, and sources of waste
- * Quantity of hazardous waste
- * Evaluation of potentially viable source reduction measures
- * Goals and implementation schedule for selected measures
- * Certifications of technical completeness and management review of financial implications

WHAT'S IN A PERFORMANCE REPORT?

- * Name, address and EPA ID #

- * Description of current waste management practices
- * Assessment of source reduction, recycling and treatment measures implemented over the last 4 years.

WHAT'S IN A SUMMARY PROGRESS REPORT?

The department is developing a format for the summary progress report. The primary purpose is to document source reduction strategies you implemented during the last 4 years, and to describe projected source reduction measures to be implemented over the next 4 years.

WHAT HAPPENS TO THE DOCUMENTS?

As a part of the generator inspection program, local agencies or the department may ask to see your SB 14 documents to confirm that you have complied with the law. In addition, the Department may request that you submit a copy of your plan and report.

The law clearly states that the department shall not evaluate the appropriateness of any proposed source reduction measure. The department and the local enforcement agency are only to determine whether the documents are complete and carried out according to the law. Failure to prepare proper documents can result in a fine.

You must have the SB 14 documents available on-site and readily available for an inspector to review. A copy of the documents must also be made available for public review.

If information in the plan or report is of a confidential business nature, you may protect this information from disclosure to the public. In this case, you would prepare two sets of

documents. Mark the set with the trade secret information, "CONFIDENTIAL BUSINESS INFORMATION". This set would only be available to authorized inspectors. The second set, would have the confidential business information removed and would be made available to the public.

DATES TO REMEMBER:

The plan, report and summary progress report are required to be completed on or before September 1, 1999.

The summary progress report must be submitted to the department on September 1, 1999.

The applicability of SB 14 is determined based upon the amount of waste produced in calendar year 1998.

The plan must cover the next 4 years (1999-2002). The report must cover the previous 4 year period (1995 -1998).

WHERE TO GET HELP:

You may refer your questions regarding SB 14 or source reduction to:

Department of Toxic Substances Control
Office of Pollution Prevention and Technology
Development
P.O. Box 806
Sacramento, CA 95812-0608

(916) 322-3670 (ph.)
(916) 327-4494 (fax)

The Department can provide copies of the SB 14 law and regulations, a guidance manual to assist in the preparation of documents (revised version expected Jan. 1999), a checklist for small businesses, and a progress report format (expected

Fall 1998). In addition, the department has a variety of industry specific resource documents, such as fact sheets, checklists, assessment manuals, and reports that are available upon request.