



Department of Toxic Substances Control



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Unified Program Agencies

HAZARDOUS WASTE SOURCE REDUCTION

We need your help! As you know, California's Hazardous Waste Source Reduction and Management Review Act (commonly known as "SB 14"), requires hazardous waste generators to evaluate source reduction alternatives to waste generation. Source reduction documents must be prepared every four years, if generators exceed the 12,000 kilograms of hazardous waste, or 12 kilograms of extremely hazardous waste, in specified years.

New source reduction plans and hazardous waste performance reports must be prepared pursuant to SB 14 by September 1, 1999, if facilities exceed the threshold in calendar year 1998. The requirements for source reduction evaluations have changed significantly since the last documents were due. Changes created by the passage of SB 1089 include:

- ✓ the elimination of the source reduction plan and hazardous waste management performance report summary requirements;
- ✓ the exemption of "offsite" facilities (generators whose hazardous waste generating activity consists solely of receiving offsite hazardous waste and generating residuals from the processing of those hazardous wastes) are not subject to SB 14;
- ✓ the elimination of the two-year progress report; and
- ✓ the addition of a requirement to prepare a "summary progress report" every four years.

Regulations are currently under development for the implementation of these changes. In addition, the regulations will include the following:

- ✓ the clarification of "automotive fluids", which are exempted from source reduction evaluation requirements;
- ✓ the addition of educational institution laboratory wastes to the list of wastes exempted from source reduction evaluation requirements;
- ✓ the clarification of the Compliance Checklist definition and format; and
- ✓ the addition of a source reduction abstract requirement to the Hazardous Waste Management Performance Report.

Because of these changes, and the length of time between source reduction evaluation and planning activities, the Office of Pollution Prevention and Technology Development (OPPTD) will be focusing on outreach and education activities over the next year. Informing hazardous waste generators of the opportunity, and obligation, to reduce hazardous waste generation

through the SB 14 process, will be our program's top priority. An essential part of that outreach will be working with Certified Unified Program Agencies (CUPAS) and participating local agencies to reach all of California's hazardous waste generators with this information. To that end, we have prepared a brochure explaining source reduction evaluation requirements for distribution to facilities during inspections. You will be receiving a number of brochures in a separate mailing. We encourage you to have your staff distribute these brochures to the facilities in your jurisdiction, during routine inspections.

We thank you for your assistance in getting the word out about the upcoming compliance deadline for SB 14. If you have any questions about this letter, the brochure, or the source reduction program, please call Ms. Kathryn Barwick Fox of my staff. She may be reached at (916) 323-9560. If you need additional copies of the brochure, or would like a copy on disk, please contact Ms. Muriel Lyon at (916) 322-3670.

Sincerely,

(signed by)

James T. Allen, Ph.D, Chief
Office of Pollution Prevention
and Technology Development

Enclosures.