



Department of Toxic Substances Control



Matthew Rodriguez
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Community Protection and Hazardous Waste Reduction Initiative Pilot Project Proposal Form

Instructions

This form contains fillable fields. Mouseover each field for additional instructions. Not all fields need to be completed for submission, and general responses are acceptable if more specific responses have not been developed.

1.0 Pilot Project Summary

Identify the primary components of this pilot project.

| | |
|----------------------|---|
| Waste Stream: | Automobile/Metal Shredder Waste |
| Industry: | Scrap Metal Recycling Industry |
| Geography: | Statewide |
| Stakeholders: | Institute of Scrap Recycling Industries |
| Government: | DTSC, CalRecycle, Regional Water Quality Control Boards, Local Enforcement Agencies |

2.0 Pilot Project Details

Describe this pilot project and how it fits with the overall goals and objectives of the CPHWR Initiative.

Research ways to reduce both the volume and toxicity of Automobile/Metal Shredder Waste produced in California. Seven of the State's largest metal shredders were issued variances by DTSC in the late 1980s and early 1990s that allowed them to treat and dispose of their shredder waste as non-hazardous in Class III municipal waste landfills as Alternative Daily Cover in spite of the fact that it exceeds the hazardous waste Total Threshold Limit Concentration of 1,000 parts per million of total lead. These variances enable this industry to generate a waste stream that is transported on public highways to landfills for disposal in a manner that exposes the public and landfill workers to potentially toxic levels of lead contaminated particulate matter without their knowledge. It is estimated that if these variances were rescinded this waste stream would become the single largest volume of non-RCRA hazardous waste generated in California exceeding 700,000 tons per year in past years. Both the volume and toxicity of this waste stream make it a perfect fit with the overall goals and objectives of the CPHWR Initiative.



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3.0 Pilot Project Characteristics

Identify any applicable characteristics of this pilot project.

- | | |
|---|---|
| <input checked="" type="checkbox"/> Source reduction | <input type="checkbox"/> Avoids land disposal |
| <input checked="" type="checkbox"/> Permanent | <input type="checkbox"/> Benefits EJ community |
| <input checked="" type="checkbox"/> High volume waste | <input checked="" type="checkbox"/> High toxicity waste |
| <input type="checkbox"/> Long term reductions | <input type="checkbox"/> Short term reductions |
| <input type="checkbox"/> Economically beneficial | <input type="checkbox"/> Avoids media shifting |
| <input type="checkbox"/> Other: | <input type="text"/> |

Describe how this pilot project addresses the characteristics identified above.

By researching methods to reduce the volume and toxicity of Automobile/Metal Shredder Waste California will benefit by finding ways to permanently reduce the amount and toxicity of this high volume waste stream.



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4.0 Pilot Project Considerations

Identify resources and tools that can be used to gather information in support of this pilot project.

DTSC has been planning a Metal Shredder Waste Treatability for some time. It is understood that this study is about to begin and when it is completed it should provide information on how to reduce the toxicity of this waste stream.

Identify other agencies that may have jurisdiction where this pilot project will be implemented.

CalRecycle depends on DTSC's variances that allow treated Automobile/Metal Shredder Waste to qualify for use as Alternative Daily Cover. Furthermore, the Regional Water Quality Control Boards approve the Waste Discharge Requirements that allow landfills to accept this waste stream for disposal.

Identify areas of potential competing considerations and objectives (including technical, legal, environmental, social, and economic factors).

There may be no technical methods that reduce the lead toxicity in this waste stream. Placing additional requirements on the Metal Shredding Industry to reduce the volume and toxicity of this waste stream may significantly reduce their profit margin.

Discuss other possible benefits in addition to decreasing the volume of hazardous waste.

Much of the waste stream consists of plastics. Removing and recycling the plastic component of this waste stream would be beneficial to the environment.

Identify the various approaches to implementing this pilot project.

Incorporate this pilot project with the on-going efforts by DTSC to implement SB 1249.

What are other key items to consider in completing this pilot project?

Completing this pilot project would support DTSC's efforts to create Alternative Management Standard regulations for this industry.