THE CITY OF
SAN DIEGO
ENVIRONMENTAL SERVICES DEPARTMENT
9601 RIDGEHAVEN COURT, SAN DIEGO, CA 92123-1636

Department of Toxic Substances Control
Planning and Environmental Analysis Section
SEP 3 1996
California Environmental Protection Agency
SACRAMENTO

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August 27, 1996

Ms. Joan Ferber
Department of Toxic Substances Control
Environmental Analysis and Regulations Section
400 P Street, 4th Floor
P.O. Box 806
Sacramento, CA 95812-0806

SUBJECT: PERMANENT HOUSEHOLD HAZARDOUS WASTE COLLECTION FACILITIES: DEPARTMENT REFERENCE NUMBER: R-95-03

Dear Ms. Ferber:

The City of San Diego continues to support these proposed regulations including the latest revisions that establish streamlined permit by rule (PBR) regulations for permanent household hazardous waste collection facilities (PHHWCFs).

The City supports the amended text exempting PHHWCFs from biennial reports [Section 67450.25 (a) (1)] and continues to support the other exemptions included in these regulations. These exemptions allow public agencies to establish and operate PHHWCFs without the burdensome regulations as required for full permits, standardized permits, and variances.

The City proposes that Section 67450.25 (a) (4) (D) be amended to allow the consolidation of waste contained in aerosol cans if conducted with the appropriate equipment and the approval of the local fire department and air quality management district.

We appreciate this opportunity to comment on the proposed regulations for PHHWCFs and applaud the Department of Toxic Substances's ongoing efforts to simplify these regulations and to incorporate the comments from the City and many other public agencies in drafting these regulations.

Please keep us on the mailing list for any future rulemaking related to this issue.

Sincerely,

Helen L. Heim for
RICHARD L. HAYS
Environmental Services Director

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