

Appendix F: Public Feedback

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2022 Workshops

Topic: Universal Waste – Current Findings, Methodology, and Next Steps

Virtual Workshop: Wednesday, June 22, 2022

Universal Waste Workshop Comments and Questions	
1.	We are currently seeing an increase of confiscated Tobacco Product Waste in school districts, many are vape products which are considered hazardous do to synthetic nicotine. Many of the school districts don't have guidance on what to do with this waste, some schools report that they just throw them away. Is it possible to get guidance on this issue?
2.	Are the DTSC battery survey results available to the public?
3.	Can you talk about the QA.QC measures DTSC takes to ensure data quality?
4.	How will the utilization of CERS impact generators who use it for other programs?
5.	For CERS, how would DTSC be able to capture the used oil directly from the generator instead of the used oil transporter in the future from UST and/or AST? The actual HW generators may not be able to provide all the doc in CERS. Not to mention some used oil generators did not have to register in CERS if they won't generate more than the state threshold.
6.	How to gather information about the occupational worker exposure to hazardous chemicals from the various universal waste in California?
7.	Could the survey results result in changes to the universal waste regulations for Small and/or Large Quantity Handlers of Universal waste?
8.	You may want to connect with the CalCUPA Forum Board
9.	With the potential use of CERS data, will DTSC be imposing other data collection tasks to UPAs or the regulated businesses?
10.	Will any of these potential U-Waste data fields be built into the CERS Next Gen project?
11.	Is there a workgroup being created for this report and can priority populations get involved? What are the future plans for outreach?
12.	How would DTSC capture the hazardous wastes generated from Very Small Quantities Generators in this Plan? Or is the Plan excluding VSQG?
13.	Will CEQA (CA Environmental Quality Act) be associated with this endeavor?

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14.	Is there a way to find out the contact information to learn about the potential occupational worker exposure to the hazardous chemicals from the universal waste in California?
15.	Sorry if this was discussed earlier and I missed it, but is DTSC considering using sales data to estimate Universal Waste generation for wastes which are consumer products, such as batteries or CFLs?
16.	In the Plan, will there be any attention to sustainable hazardous waste management options, such as reuse, recycling, citing incinerators in California so we aren't relying on transportation to out-of-state facilities?
17.	VSQG would have an important component to determine the environmental justice in the Plan. Most of the VSQGs could have been captured in the CalRecycle Form 303 as part of HHW due to HSC 25218.1(e). Just a comment.

Topic: Manifested Hazardous Waste – Definitions, Methodology, and Data
 Virtual Workshop: Wednesday, July 20, 2022

Manifested Waste Workshop Comments and Questions	
1.	Where would I track a company sending "non-hazardous waste"?
2.	Why some companies have CAL EPA # and others RCRA #?
3.	Filter cake produced by metal finishers contain metals. What is the concentration threshold to determine if the concentration of metals (example zinc) meet the criteria for the filter cake to be excluded? Or not to be manifested as hazardous waste?
4.	Will we be getting copies of the slides?
5.	So a waste that is identified and have a characteristic of toxicity is considered RCRA waste, right. So is the same waste in California, that also meet the same characteristic, is considered Non-RCRA?
6.	Should we then use WET more than TCLP?
7.	What is the URL where it will be posted?
8.	DO YOU HAVE TO HAVE ALL OF THE TOXICITY TESTS DONE ON A POTENTIAL HAZWASTE SAMPLE?
9.	The HW Report due on March 1, 2023--- Is this specific to DTSC or also business?
10.	Can you transport a Non-RCRA waste out of state for disposal in a landfill there?
11.	Can you discuss the testing difference between the TTLC and STLC?
12.	Diana Peebler is so uniquely knowledgeable here!

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13.	Hi Diana, might be a silly question, but are computer cables and electric wires considered e-waste (universal)? or are they non-hazardous solid waste?
14.	Where would e cig liquid (toxic waste) fall under on its own? Does it change in tobacco product that are mixed waste like a non-removable battery and e-liquid combined?
15.	Utility Pole waste - I am getting mixed answers on whether or not I have keep any documentation (for any period of time) or if transportation needs to be done by cert transporter?
16.	If a school confiscated vape pens with nicotine still inside, are they required to handle them as federal P-listed wastes? If they have more than 2.2 pounds of nicotine, are they not eligible to use a household hazardous waste facility as a VSQG since they have more than 2.2 pounds of an acutely hazardous waste?
17.	How is the most acutely toxic waste disposed?
18.	WHAT HAPPENS IF IT PASSES A FISH STUDY, DO I HAVE TO DO ANOTHER TOXICITY TEST? LIKE, INHALATION, DERMAL, ETC.
19.	We usually request for all the toxicity test (TTLC, STLC, TLP) and I have faced issue where the disposal facility has questioned the TCLP and WET results. In theory, STLC should be 10% of TTLC because of 10 fold dilution during the analysis while TCLP has to be 20% of TTLC due to 20 fold dilution. We have had to have the lab to verify and provide the letter verifying the QC process and that the results are correct.
20.	Let them know we cover this subject of hazardous waste determination also in our California Compliance School 3 day class, which includes graphs and flow diagrams to illustrate the classification of both RCRA and Calif wastes
21.	Would Tobacco Butts, and Vape Waste be included on some of these standards? We did a cleanup not to long ago in a small town street and found tobacco product waste (1324 butts made out of cellulose acetate cigarette).
22.	What about bulk empty containers that you are not sure if it held a hazardous waste?
23.	Are Brake Pads recycled Scrap metals or contaminated debris?
24.	Seems like Diana is the expert. Would she accept questions in the future? if so please provide email.
25.	Why does LBC or DHL courier not allow our water pouches for export? What do we do to make them carry it?
26.	Is it advisable to do ignitability test on a solid waste?
27.	Nicotine that is from a Household is not RCRA regulated and therefore not a P-waste.
28.	Manufacturers of jewelry use gypsum that is eventually manifested as Non-RCRA. What is the best determination to be on the safe side?

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29.	If a business generates 1Kg/2.2lbs of e cig waste (from use by their employees) then is it also responsible for disposing as hazardous waste and therefore also responsible for the cost of disposal?
30.	Why does the DTSC store hazardous waste? Is it waste generated by state agencies?
31.	Household Hazardous Waste Programs have very few (if any) options for proper management/disposal of e-cigs and vape pens - often there are multiple hazards within the item, from the nicotine or cannabis to the imbedded battery in it. Just FYI - suggesting that they come to HHW is not exactly a viable option.
32.	The Generator Improvement Rule.... is there an update on that?
33.	Being new to Haz Waste Management, where can I go to study and become familiar with CA Haz Waste Mgmt
34.	How to I become a Diana!
35.	Is the report due in march of 2023 significantly different from the biennial report?
36.	if the uploaded e-manifest differs from the uploaded paper copy, which does DTSC consider the valid one?
37.	To what extent do states work to standardize or harmonize their standards?
38.	What, if anything, is DTSC/CalEPA or Federal EPA doing about difficulties finding any TSDF's that are receiving hazardous waste currently?
39.	Will DTSC continue to require mail in generator copies?
40.	Unmanifested Waste: Does this include only HW that is not required to have a manifest (e.g. asbestos) or does DTSC intend to attempt an evaluation of illegally unmanifested waste?
41.	For manifests that are not fully electronic, are generators still required to mail a copy to the DTSC.
42.	Doesn't DTSC keep track of incidents of illegally unmanifested waste based on enforcement actions?
43.	Can you ship a non-hazardous waste on a uniform hazardous waste manifest form?
44.	Will your tracking data allow CA to understand better out of State disposal and where it may be ending up in out of state EJ communities?
45.	I'd like to piggy back on TSDF storage capacity to accept wastes. In the coming years, there will be an influx of waste solar panel as Universal Waste. Do you anticipate any issues with the recyclers capability to accept these wastes considering solar panels are a lot bigger in size and volume compared to most types of universal waste.
46.	Are there any plans for the DTSC to adopt the federal exemption for hazardous waste DEA controlled substances to not require management as a hazardous waste so long as it is incinerated appropriately as a DEA regulated substance.

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47.	Somewhere in your presentation, if you have time, you may let them know Sgt. Dave and I are finishing the CCS Manifest training to the Federal DOT 49CFR standard....and will be offering this class Statewide this year !..after DTSC review of course!
48.	Wouldn't that still show up as manifested wastes?
49.	But isn't that what the legislature was asking for in 158?
50.	Homeless encampment cleanups with biowaste... is that really hazardous waste? It doesn't seem like it falls in the medical or other types of regulated waste category, our waste disposal facility states that it's haz and we're having to manage it as such on a manifest. It's non RCRA and non-infectious waste.
51.	Wouldn't the illegally disposed waste ultimately be manifested by whoever address it and disposes of it properly? So, you would still have that data, correct?
52.	Is there a database that summarizes the total fines for levied and the type of violations by the DTSC?
53.	What would DTSC say to critics who oppose dumping California's waste in communities in other states for purposes such as incineration? What is DTSC doing in regard to alternative treatment technologies and reducing overall waste?
54.	For the new report that will be made, do you guys have a plan for community or stakeholder input? If so, how do we get on that listserve?
55.	Since there is already the Hazardous Waste Tracking System, do generators still need to mail a copy of the generator's initial copy manifest to DTSC
56.	Went through the entire program with Glenn Forman and JosiLin in a day long zoom meeting.
57.	Chmirs documents dumped haz waste, doesn't it?
58.	Some agencies have an app that allows for taking a picture with location data for reporting abandoned waste - pretty cool
59.	California Hazardous Materials Incident Report System Database.
60.	But yes I agree prior wouldn't want to double count
61.	'@diana - it's human fecal/liquid waste.
62.	como se puede organizar una limpieza en la comindar donde muchos dejan basura, ahi una imagen que se puede usar para guia.
63.	CalEPA complaints has the potential to collect images associated with complaints.
64.	CalRecycle has a website for illegal dumping resources, https://calrecycle.ca.gov/illegaldump/
65.	Sorry about that! I am one of the BES members btw.
66.	I believe other members may be participating as well.
67.	Does this account for material that is manifested to a transfer or buling (recycling or treatment), facility and then manifested again to a final destination? this would double count the material.

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68.	Don't forget the Mecca issue of a few years back. Many more example of illegally managed HW are in DTSC files and records: https://www.pe.com/2011/04/11/environment-public-agencies-took-contaminated-soil-to-reservation-facility/amp/
69.	Can you please go over the reciprocity rule(?) with Nevada? And with what other states does CA have such agreements? And is this in effect a one-way agreement (based on an assumption that CA haz waste is more encompassing)?
70.	If non-RCRA HW shipped outside of California for disposal is not subject to any regulations and potentially going to general landfill in another state, this defeats regulating it?
71.	With the new fee structure coming into effect for Hazardous Waste Facilities in California as part of SB 158, many of these fees are being passed down to generators. Does the DTSC expect this to cause even more hazardous waste to be sent out state as a result?
72.	I could elaborate on the non-RCRA export issue for disposal in Nevada.
73.	Apologies if already asked earlier, but I understand the Department was in the early stages of developing an electronic means of submitting manifest documents (rather than snail mailing to the PO Box) including exception reports, correction letters, etc. however, it's not on your future endeavor slide?
74.	These workshops are really helpful. Thank you!
75.	Can you have a detailed section on waste determination process?
76.	How do you sign up for the upcoming Aug 3 & 17 classes?
77.	What was the question regarding number of Class I , II, and minor violations and a dashboard?
78.	Thank you guys! this was great. the public's questions were really good.
79.	Thank you very much DTSC Team. This is a great workshop. I learned a lot.

Topic: Hazardous Waste Transportation – Distance between generators and destination facilities, transportation options, and considerations for transportation cost.

Virtual Workshop: Wednesday, August 3, 2022

Hazardous Waste Transportation Workshop Questions and Comments	
1.	Does aqueous alcohol included in the manifested waster for declaration?
2.	In the HWP, shall we only refer to DOT 49CFR?
3.	Are recalled medical device by US FDA part of the manifested waste?

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4.	Too bad DTSC doesn't consider whether a disposal facility's permit has expired years ago and if it was issued with racially discriminatory processes - as is the case with the dumps in Buttonwillow and Kettleman City.
5.	Which facilities in Utah? please be specific
6.	Possibly, Clean Harbors in Aragonite?
7.	Will there be an effort to track Generator self-transport and self-transport to local HHW facilities that provide VSQG programs?
8.	If the company does not have the resources to report, what is the penalty
9.	Where can I have the final draft of the SB158
10.	How did DTSC take into account of the weather factors (snow, rain, etc.) that increases the distance like in the wintertime?
11.	Trucks are restricted to Hazmat Routes, how are you accounting for hazmat Routes?
12.	Sometimes, the transporter may have to turn around at foothills then wait until the unstable weather passed. CHP or CalTrans could turn semi-trailer around if carrying hazardous materials (including hazardous waste).
13.	Can you give us some sense of the completeness of the manifested waste system. i.e., how much "transported" haz waste is not captured within this database vs the transported haz waste that is captured?
14.	Has DTSC checked hazmat transporters, not necessarily hazardous waste transporter, for transportation pricing? Perhaps, UPS, USPS, and FedEx can give DTSC some idea of pricing in terms of Dangers Good Freight pricing to get a baseline.
15.	No to mention about the pre-planning route for explosive and radioactive wastes
16.	Are you in a position to disclose what methods are being considered for waste removal from the SSFL?
17.	Referring to 1) manifested waste where the data was not entered into the system or lost manifests, and 2) haz wastes not manifested
18.	Haz wastes not manifested as in illegal activity

2023 Workshops

Topic: 2023 Draft Hazardous Waste Management Report Workshop #1

Hybrid Workshop: Wednesday, August 9, 2023

In-person Location: CalEPA Headquarters, Byron Sher Auditorium, 2nd Floor

REPORT FOCUSED - Workshop Questions and Comments

1.	<p>I'm with the Contra Costa County Health Department, and I staff our county's hazardous materials commission, and which has been in place since the 1980s when Contra Costa County adopted its first hazardous waste management plan and I testified at hearings around that plan in 1989. So, I've been involved with this for a while. And I gotta apologize. I'm using this meeting as my introduction to the draft plan, and I haven't read it yet. But I do think just based on the introduction that you provided it would be good even in the introduction to talk more about concepts of environmental justice and how those got started. The environmental justice movement got started in the 80s with the disposal of illegal disposal of hazardous waste in Warren County and their decision to build a landfill there. And so, I'd just like to see more of that. And, it might be in the introduction, and I apologize because I haven't read it yet, but certainly not in your presentation. And so, I just think, from the very beginning, those concepts need to be weaved in to how you present hazardous waste management issues. Thank you</p>
2.	<p>Do you have a breakdown of how much of California's hazardous waste is generated by small generators versus large generators? Does DTSC track this type of information?</p>
3.	<p>Thank you for your presentation today and for your work on the Hazardous Waste Report. There is so much information here, and in working with various community organizations throughout Los Angeles and Central Valley that are impacted by contaminated sites or hazardous waste in their communities, we would recommend extending the deadline for comment from a 60- to a 90-day comment period, to allow communities additional time to work through this and process this information in order to provide you with feedback to strengthen this report and plan development.</p>

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4.	Impressed w/data, charts, visuals. I agree with the 4 points that you put at the end of your report. I would say maybe there are 2 others to add to that one I've already mentioned today is education. I think that educating the public about hazardous waste and how the demand side effects the generation of hazardous waste. I think that would be a good thing. Appreciate comment about educating regulated community on HW identification. San Joaquin County puts on training for regulated community that is good through a consultant. Second - add in metrics/data and recommendations around enforcement. CUPAs do a lot of the enforcement action but want to see how enforcement has changed since 2010, including fines/actions. Something going forward you need to continue. Concerned about resources - there is a lot of work to be done and DTSC is doing tremendous work. Hope that DTSC has the resources to execute on the plan.
5.	Pardon me, did you say that 80% of waste leaves the State?
6.	Can you please repeat why you think that hazardous waste is not processed in California? Or why it is being shipped to other states?

PLAN FOCUSED - Workshop Questions and Comments	
1.	From a source reduction perspective, Is DTSC open to incorporating by reference Federal CCP reclamation regulations.
2.	Under Waste Reduction: Recycling- does this mean it can be used as a fuel for incinerators. Incinerators are Dioxion Production Units, bad
3.	Is DTSC doing anything to incentivize the construction of new/upgrade of existing management facilities?
4.	Circular econ: how do we allow generators to treat waste & reuse waste in their processes, so they become more circular. It is difficult to treat waste onsite, so they tend to send it offsite for disposal b/c it's easier.
5.	Given that these wastes would meet the toxicity criteria, and that these wastes are highly mobile which placed on the land, will DTSC allow this highly toxic hazardous wastes to be disposed of in California landfills?
6.	DOD Guidance requires STABILIZATION prior to landfilling and the disposal contracts are not in California.
7.	If we have capacity for 20 years, then no expansion of these two facilities. Can we take expansion of Kettleman off the table?
8.	Are there plans to track universal waste, especially batteries (lithium-ion)
9.	Should make it super expensive to take wastes generated in California out of state for disposal.

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10.	Worked in HW area in CA since 1980's. Issues urge DTSC to look at is cost that various states charge for management of HW, particularly HW generation in CA and shipped to those other states. Nevada for example has a very low rate for CA-only HW to be disposed of but can only go to 1 facility in Nevada (owned by state of Nevada & interested in keeping that facility solvent). Charge fees that are equivalent to non-HW. Look at same for Arizona and Utah and what kind of fees are being charged. It's also recycling (CA charges fees for recovery of HW), but many can be shipped out of state (both RCRA & non-RCRA) for disposal for lower fees than onsite recycling.
11.	In the 2025 plan, is DTSC planning to address the concern of the remaining capacity of hazardous waste disposal and the capacity requirements set forth for CERCLA funding?
12.	What is the official or stated rationale for the policy of disposing of waste in state? I have often heard of the policy but have not actually seen the rationale written anywhere. It is helpful to understand the overarching policy objectives when fashioning recommendations.
13.	Link back to generators. In Ch 2 talked about ~2000 gens who do onsite treatment/recycling which has a lower regulation burden than permitting. Link these efforts of P2 to consequences of that when talking about reducing permitting requirements for excluded wastes that will be gen onsite. If we incentivize onsite management it comes with risks and accumulated risks in lifecycle of the facilities. Do not see a good track record of closing out processing/activities at these facilities (assuming they haven't contaminated the ground water).
14.	Do not lower the bar. California only Hazardous Waste needs to be managed in California. Close our borders.
15.	Concerns with universe of data being presented related to gens is geared towards what is generated and tracked (recorded on a manifest or otherwise). Plug in for importance of understanding what is happening with onsite treatment and storage of HW and importance of understanding volumes involved and kinds of gens that are doing that kind of activity b/c what she's seeing from standpoint of working in financial industry and financing commercial props, coming across former storage areas where there was never a close-out and CUPAs implementing slightly different programs and not tracking, existing generation requirements for accumulation and storage is very buried in existing regs. While going through gen improvement now, it is important to look at b/c we are not seeing that those storage areas are being adequately closed out b/c they are finding them all the time in real estate due diligence program (cl solvent vapors ex). These can be tied back to HW activity. Have complex requirements on how gens are regulated/counted. It's such a direct tie to EJ issues related to HW mgmt in CA.

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	Properties that have biggest probs are in neighborhood that have biggest problems in that area
16.	Worked with Senator Obama when fed senator to ban export of Mercury (Hg). Dept of State was instrumental in treaty on Hg. Much of Hg that was being sent out of country was being sent to places like Indonesia, Vietnam, Cambodia & env damage on ground and public health was horrific. Looking at e-waste that is being sent to some of these same countries. Those looking at international waste trade know what that looks like on the ground & most at DTSC do not know this. Pictures at Basel Network of small children burning electronic components to recover copper in open burn pit style & implore you to add these pics to report. Public health and EJ issues on the ground when these wastes are exported is horrific and we should ban it. It is an international thing but should try to manage it more responsibly than sending it to the "third world" (developing countries).
17.	When we talk about focusing on EJ, biggest concern is that DTSC in delegating so much of its program to the CUPAs has lost the thread of addressing EJ issues that come up from generator side and what happens at those properties, and they are not closed out properly (look at pre-2010 data to see where highest risks are). Look at risks on context of communities that are more affected when there are problems with these types of activities. Been to several community meetings and they look to DTSC as experts on toxics and somebody will ask about their issues in Vallejo, and they are shuffled to the side b/c there are no permitted facilities in Vallejo. Businesses need way to understand requirements and where to address their concerns/complaints.
18.	Bring back statements to his CUPA at local level - after looking at info in report, is State's HW management program working? Is the system working or does it have problems? If focus is on EJ and plan moving forward, has HWM report collected data to enable DTSC to make determinations about env injustices throughout the state, what they are, and how the State is going to address them.
19.	DTSC should use EnviroScreen to identify at least three new locations for facilities and then put out a request for projects - letting the facilities choose the locations results in sitings in EJ Communities. We need new facilities here if we are to stop the expansion!!!!!!
20	Non RCRA waste shipped outside of CA, is there concern that this practice serves to simply move the waste to another state where the practice to dispose of would not be allowed in CA?
21.	Revisiting definition of a HW. Hasten to recall that when Jess Huff was director he did regulatory structure update (RSU) which was to change criteria for identifying HW for some that were overreaching. There was pushback from legislature and environmental groups. Big cleanup happening at time was Lead (Pb) contaminated soil from new Giants stadium in SF. Nothing of substance came out

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	of RSU. Agree with comment that more attention needs to be focused on HW classification system because the framework needs to be better understood by everybody in CA.
22.	Wondering - as you looked at this, did you look at possible waste streams to consider for exemption based on not thinking that they should or be designated as a HW? Not sure how those exemptions came into place originally. Talked about legalization of cannabis and it being classified as a HW. Maybe it should be managed as a HW or a universal waste. Can you take a look at individual wastes?
23.	P2 being pushed because local HW landfills filling up and cost of HW disposal would go up significantly and made P2 much more attractive. Want to know how much we'll be looking at cost structure of HW disposal to make P2 more desirable. Situation in Contra Costa Co. in 80's/90's where facility under guise of P2 was taking waste from TiO ₂ process to make cement and selling it as road base and had high levels of dioxins in it (years of lawsuits, cleanup, etc.). Before we approach P2 make sure it's safe and effective before proceeding.
24.	The Department of Defense just issued its new guidance document on PFAS wastes including its fire fighting foam. This guidance allows for the disposal of these wastes into landfills with landfill gas collection systems. California has the most landfills with gas collection systems. Since landfilling waste is cheaper than incinerating it (which is also allowed under the new guidance) it anticipated that a great deal of this waste will be disposed of in California municipal waste landfill.
25.	Contaminated soil - in this section, some of our now contaminated soil is naturally occurring. E.g., if lead is naturally occurring, what happens to that landowner or facility who finds it. If they can't treat it there, we run into the issue of waste going out of the state.
26.	Does naturally occurring soil ever reach hazardous waste levels of lead?
27.	I agree with Marty Walters' comments regarding needing better tools to help hazardous waste generators identify those wastes.

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28.	<p>When we talk about HW characteristics in CA, we say it's complicated. There are few gens in CA that can take a stab at characteristics their waste and rely heavily on their vendors to do that for them and do not have the same knowledge as the gen has. One thing that is left out of non-RCRA HW, is all of the exclusion from solid waste, exclusions from HW and weird exemptions that exempts you from part or all (e.g. recyclable materials) of HW requirements. Looking at universe of HW out there, diff between fed and state exclusions contributes a fair amount to what is reg at state versus fed level. Often trying to minimize complexity of HW class. DTSC should put out modern tool that helps people understand and characterize their waste (language/structure of this chapter in regs, complexity of trying to reconcile state vs federal regs is really hard and can make ppl feel hopeless when they are being inspected. Be clear about how different wastes become hazardous. We saw how much contaminated soil is generated in CA and the consultants who manage it do not understand the contained in rule or mixture rule, so it is not correctly managed.</p>
29.	<p>I agree with Marty Walters' comments regarding needing better tools to help hazardous waste generators identify those wastes.</p>
30.	<p>Helpful for some of information - when we separate RCRA vs non-RCRA w/generators and get more info on hazardous material (most ppl don't see lotion as hazardous). Vocabulary on street is not on par with what DTSC is doing. All counties are not created equal. He is from Alameda Co. he gets monthly reminders to bring his stuff there, there is pick-up, and some ppl don't have that pick-up option. When you look at who is doing well and who is doing it.</p>
31.	<p>Data gap piece - not sure exactly how data will support what you're trying to do, but looking at TRI could be valuable in looking at where higher concentrations of releases to be an indicator for HW generation.</p>
32.	<p>Important to explore new emerging technologies to neutralize and treat wastes, in California</p>
33.	<p>One could introduce stricter tracking on batteries/UW document requirements first on SQG/LQG of hazardous waste.</p>
34.	<p>With an increase in renewable energy production, will there be an emphasis on waste management or recycling of battery storage, PV panels, wind turbines?</p>
35.	<p>In this introductory section, ask for your maybe perspective on including the kinds of waste that we're now starting to see, for example, in wildfire. You know, wildfire events where we have burned up homes. You know that imminent and substantial endangerment (ISE) category, because I know that clean up waste seems to be a big portion of Kasu waste that's generated in California, and that element of imminent and substantial endangerment. It's kind of a new thing, it seems, when it comes to managing hazardous materials that are occurring and need a lot of it's a</p>

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	large volume of material. That's being you know that that requires management after one of these terrible wildfire events.
36.	Does ID number tracking count exempt 10-day transfer locations and do we know how many of these there are? These are high risk b/c loads are consolidated and there can be accidental incompatibilities. There is a lot of temptation to repackage waste at these facilities even though that's not allowed.
37.	P2 - it's an important issue; involved since early 1990's; foundry significantly reduced HW and employee exposures and GW impacts and increased productivity by 2x. It's a good thing and very effective. Experience with SB 14 was that nothing worked and there were too many ways to get around it. There is an "out" b/c there is nothing we can really do. Circular econ goes beyond HW (recycling, reuse, reduction of raw materials) only goes so far. Valuable for DTSC to partner with other state agencies such as CalOSHA and industry. Sustainability (ESG) reporting - companies are under a lot of pressure to eval emissions (waste gen, water use, etc.). Europe already has this reporting requirement in place. Real opportunity to grow P2 and maybe call it something else. If it's just DTSC pushing it, you won't get far since it's a broad issue.
38.	Were able to get CARB expand TAC list - took 3 years. Changed regs to what made it hazardous air pollutant and expanded to authoritative bodies. DTSC is stuck 50 years ago. The stuff that will become a GW threat is not even on our radar screen. Only way to look at that is high production volume chem list. What are you producing to chem industry at high levels. A lot of that is CBI. In perfect world, DTSC would be looking to expand and link it's reg structure to that list.
39.	See value of flat rate b/c it's simpler and balances out gen. It doesn't take into acct various toxicity of different HW. Various toxicities - if you have a flat rate, you aren't able to see hose externalities.
40.	Consider issue of treatment fees compared to initial gen fees. Situations where a recycling facility or treatment facility treats a waste that was previously gen and gens a new waste and has to pay a fee. There might be a benefit to treating/recycling waste to lower toxicity but not have to pay the total fee on that because the toxicity was reduced. This could complicate fee structure considerably.

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41.	Recognize this discussion is related to promulgate a HW mgmt plan for DTSC. Want to touch on 2 things re: topic. Following & will utilize opportunities to learn from recent experience in shortfall in revenue experienced by DTSC requiring borrowing. Important when a gov program inherently tries to use econ factors like fee structure to promote a different outcome. By charging, you can reduce the amt of the problem. Lesson needs to be taken and kept in mind with efforts to reduce amt of H2O we consume. If you're successful, you result in less \$\$\$. Fixed costs are being spread over fewer units so the cost goes up.
42.	Difficult/expansive/complicated subject. Hope to set as a priority in dev plan (most important undertakings this Dept has taken on in a long time) keep in mind the thought of producing a report and encouraging those who write regs to use more plain language to understand complicated subject matter. Raise notion of plain language explanations - since disposal represents last recourse in terms of priorities, it would be valuable to assess cost of replacing existing facilities that are here. Costs to everyone is part of the discussion. Last - give thought to benefits of activity and expenditure of taxpayer \$\$ and fees - who benefits. Polluter pays concept makes sense, all of the ppl of CA benefit from the successful execution of this enterprise and should be funded by the general fund.

GENERAL – Workshop Questions and Comments	
1.	From my own experience to touch on the pickups, possibly more pharmaceutical waste (expired/unused med) pickups would be helpful or more education to the general public on these locations
2.	A lot in the report on generation side. How we deal with generation, reduce generation. This data is complex and a lot of analysis to be done to eval what is going on. Interesting as to what's going on with contaminated soil and curious to know what is going on with that. Generation is the problem. Map is significant - how many are LQG, SQG, CESQG. Almost more concerned with CESQG& SQG b/c not as sophisticated with requirements. Have to look at how to reduce generation even more and educate general public - it is an econ demand issue. We are producing products that generate HW (externalities that are HW). Educate gen pub on what they are purchasing and how it is influencing the HW generated & impacting communities who are suffering the most from HW disposal.
3.	Just wanted to confirm that you said there isn't any permit applications being reviewed for new TSDFs?

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4.	<p>Frustrating outcome of Exide cleanup of soils, much of Pb contaminated soils are being shipped to AZ. Something the Exide community advisory group resisted and was not happy about. Never as a state have not embraced HW task force which was that a lot of these metals are very valuable, and CA should either store these metal contaminated soils until we can reclaim them or get busy to reclaim these valuable metals. CA has lost its hegemony over HW that it had in the 1980's and outcomes it has led to is a lot of export of HW. A lot of the HW is sent to incinerators in Utah b/c of public outcry of incineration in CA. CA has only R&D facility for supercritical water oxidation and waste is taken from all over the US. Came out of Nation's successful program... CA has neglected to use supercritical water oxidation as a method to treat toxic waste. PFAS treatment team at EPA came to San Diego to eval this supercritical water oxidation.</p>
5.	<p>Super Critical Water Oxidation was supposed to be reviewed as a pilot to the committee formed to look at waste reduction. It was a big failure of this process to not look at alternative technology pilots. This committee went to San Diego to look at SCWO, it is an outstanding technology. Need another visit there.</p>
6.	<p>Being handled safely in other states, but not to non-RCRA standards (UT & AZ) b/c feds wouldn't regulate it as such. If non-RCRA HW can go to any recycler/recovery facility in other states and typically not being charged a fee in the other state b/c they do not recognize it as a HW in that other state.</p>
7.	<p>Can you repeat how much waste is managed in CA vs. out of state?</p>
8.	<p>I suggest companies try and obtain their ISO14001 certification since it also covers all of this as well and how controlled everything needs to be from cradle to grave. I know we had to do this in order to receive it and are audited every 6 months in order to maintain it.</p>
9.	<p>Does DTSC's ID number database track transporters' 10-day transfer facility locations? Do you have a count of how many 10-day transfer sites are located in California? These are pretty high-risk locations, because loads are consolidated and there could be accidental incompatibilities, but also there's a lot of temptation to repackage waste at these facilities even though that's not allowed.</p>

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10.	CA is unique in the US in that we regulate waste that comes from petroleum refining sector. A great deal of waste from LQGs is from refineries. Prob with reg system that DTSC is implementing - Has sub control law was primarily designed to protect GW sources from HW and we have failed b/c we have PFAS everywhere. EPA has failed. That is not the only HW that are being produced that are toxic and highly mobile. Prob - wastes that are being produced are not being handled as HW. They are being handled as solid waste and that is why we every landfill in California has contamination of hexavalent chromium (Cr 6+) and fluorinated compounds. What compounds are being produced that are generating these? EPA says >1 million pounds per year. In past, served in fed advisory committee - reg system is not nimble enough to effectively regulated these changes in higher production volume chemical stable of chemicals we produce. This is why we have this multibillion-dollar contamination problem. GW contamination because more problematic and don't see it being tackled in this overall scheme. Every TSDF does not have adequate measure or cleanup funding. For Exide, will pass costs on to public.
11.	Plain language concept is not a bad idea or use of time. Asked about when slides would be posted on website
12.	Bring Back POLLUTION PREVENTION strategies!
13.	At our site we use Covanata which and send zero waste to landfill.
14.	On a federal level, CCP legitimately reclaimed per 40 CFR 260.43 are excluded from solid waste regulations.
15.	Just moved to California, grateful I came across this meeting. I'm learning so much from the presentation and questions/comments! This is great.
16.	Just confirming that Non-RCRA/CA-only HW are only required to be manifested but not required to be managed as HW if not considered HW in the destination facility's state.
17.	Can you repeat capacity of landfills in CA?
18.	Can you repeat what percentage is non-RCRA and RCRA waste?

Topic: 2023 Draft Hazardous Waste Management Report Workshop #2

Virtual Workshop: Wednesday, September 12, 2023

Workshop Questions and Comments	
1.	I appreciate the concentration on soil contamination. What other methods are you considering other than excavation & removal to other sites?
2.	In terms of stakeholder engagement moving forward, should we wait for upcoming workshops or engage with the Department directly prior to

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	workshops? For example, if we are interested in CA only Haz Waste criteria, will there be a workshop on that specifically to help inform the plan?
3.	Would love to see workshops on learning more about alternative technologies & approaches to waste reduction, please
4.	Would generators that treat hazardous waste on-site be responsible to pay the Generation and Handling fee if the hazardous waste isn't shipped offsite?
5.	Why is contaminated soil and/or construction demolition debris outside the DTSC's jurisdiction? Especially if contaminated with above Title 22 metals? Did I hear that correct?
6.	I'm going through this plan and writing comments, and I'm wondering about the comment that was made about generators having limited access to the manifest system. As I understand it, that is now an EPA electronic system. And one of the questions that I, what a comment in the report will be about who has access. What kind of access do they have? So, I need to answer that now. But I would. It's a little bit confusing. So maybe I'll say: What information can the generators access in the manifest system?
7.	In reviewing the report and discussing capacity, a statement is made that communicating with the communities is going to slow down the process. And there's another statement made about how people who are living in poverty will probably not have any sustainable development. And I read that one this morning, and it's like what it does. Is it signals? Yeah, we're saying all this stuff about environmental just. But really, the way we feel about it is, it's just going to slow everything down. Now, I'm not going to argue that that's the way you're looking at this. But those 2 statements are really quite problematic. And the other thing I wanna say is that as I work on this. and you mentioned that a lot of it is not for the report for the plan. I suspect a lot of our comments will be for the plan. But we'll submit them in as many times as we have to. Thank you very much for listening. You have a big job, and I will go ahead and sign off and come back on.
8.	The DOD is requiring military bases to dispose of pfas contaminated soil and AFFF (in 5 gallon containers, usually) by disposal in hazardous waste landfills, or incineration or injection wells. Have you seen an increase in requests to dispose of PFAS contaminated soil from CA military bases and what are the requirements for pfas contaminated soil and for disposal of AFFF?

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9.

I was just going to make a comment specifically on contaminated soil, because that is sort of the largest volume, I guess, by weight or by volume of hazards waste. It's manifested off site. And I noted the comment sort of about you're not responsible for construction sites. But I do think that it's important to consider the DTSC as a whole in terms of the way the Site mitigation program interacts with the Hazard waste management program. And then, of course, with you, you know, Sister Agency, the water boards and their cleanup programs are also generating hazardous soils, or, or, you know, contaminated soils that could be classified as hazardous waste. And the thing that to me is also very confusing and can be very confusing, for the public is that DTSC has a guidance document out there about reporting contamination. You know that reporting releases basically. And it's a detailed level set of guidance. And there's a whole bunch of standards that are set for you know what is considered an elevated amount of contamination and soil that is different from the way that soil is characterized when it's managed as a waste. And I feel that this group, you guys along with the site mitigation folks along with the water board could really improve significantly the understanding of how those work together when there is construction, activity and soil is being removed from the site, for you know, some reason or another, and I think that there, even among I work in the commercial real estate industry quite a bit. And even among the developers and the people who are working on these projects and their consultants included, you know, there is not a clear understanding, even though there's a bunch of guidance out there. There's a bunch of stand, you know, health based levels set for various kinds of contaminants in soil. The way, then, that that eventually gets managed. You know that none of that's very clear. And I think it's particularly if it's not clear to the people who are doing it. It's certainly not clear to the public in terms of how those things interact and work together. And so I would just suggest that this group really work toward clarifying that process. And how there are different. You know, different sort of levels of engagement that DTSC has with that industry and with those materials.

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10.	<p>I don't disagree with that. But I think there is also the case where there's a release of hazardous waste, and the release of hazardous waste is a different question than a release of hazard substances. And so I think all of that stuff has to work, you know. There it has to be clear, and it's very unclear, and I don't think that DTSC is doing itself a service in the way that it's discussing this to date, which is sort of saying we're just not responsible. I think that's not the right answer. I think the right answer is to look at how these different authorities work together. Because, yes, the site mitigation program is under a different statutory authority than the hazardous waste management program. But the hazardous waste management program also has a cleanup component and also has triggers, for when hazardous waste is released into the environment, and that all ends up generating things like contaminated soil that then has to be managed appropriately, and that process is not clear to the stakeholders, and it's not clear to the public.</p>
11.	<p>It's not just, but it's not just corrective action. It's also closure. And it's closure of hazardous waste management units. But it's also closure of things like 90-day accumulation storage areas. For example. So, I think there's a there is a range of activities that can trigger these kinds of different requirements.</p> <p>And that's where I feel like we're missing the boat in terms of really understanding the very largest proportion by volume or by way of hazardous waste that gets manifested in the State of California</p>
12.	<p>I'd be happy to put my comments in writing, and I'll try to do that. But I think there's a little bit of disingenuous thinking here because of those construction sites that you're talking about. There is a fairly large proportion of the source of that contamination being from previous, maybe historical hazard, waste management, generation or historical on-site treatment. You know that your classic on site, for example, recycling of solvent, for example. So, I'm and I don't want to take all your time. This is a this is a workshop that doesn't need to dive that far into the weeds. But I do think that you know hazardous waste is a very complex topic, and the way that we characterize hazardous waste in this state is very complex, and I think there is a tendency to oversimplify and thereby misdirect people, you know, and misrepresent what's really happening on the ground. And I think we have to do better than that. We can explain a complex system to the public, and we have to make the effort to do that without losing the nuances of what's actually happening on the ground.</p>
13.	<p>There was a new federal Manifest implemented in 2006 but the electronic manifest system was implemented in June 2018</p>

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14.	Are PFAS compounds identified as underlying hazardous constituents under RCRA? Are they subject to any of the land disposal restrictions treatment standards?
15.	Not a question just information: , the final rule on PFAS CERCLA designation for perfluorooctanoic acid (PFOA) and perfluoro octane sulfonic acid (PFOS) has been delayed from August 2023 to February 2024.
16.	I want to make a comment about contaminated soil. And that is, I think, some of the frustrations in the communities. It are based on a situation where the community feels that there's a really bad pollution problem. And DTSC comes out and does some sampling and they say, Oh, it's okay. And the community still doesn't think it's okay. I think very clear information needs to go out in the way that samples are taken on contaminated property and there ought to be requirements for certain statistical number of samples that are taken that everybody can understand. We had a site where we worked pretty hard to point out that there was contamination there that nobody had even tested for and that didn't go very well. So I am now. Going to say, I worked at DTSC for a long time. I love DTSC, and then I make these comments, they're all about making your organization better .I don't want it to seem as a critical comment. But that's what it's about.
17.	When you mention 6.8 and 6.5 authority for soils is DTSC referencing HSC?
18.	I would like to see a presentation on SSFL and its cleanup status
19.	This is a comment, not a question, and we will be submitting this feedback in our comment letter: On Page 28, the Report states, “To encourage a circular economy for these wastes and maintain health and environmental protections, DTSC should further examine challenges and opportunities around this issue in the Plan.” There is no “waste” in a Circular Economy, therefore this sentence should be rewritten to read: “To encourage a circular economy for these materials and maintain health and environmental protections, DTSC should further examine challenges and opportunities around this issue in the Plan.”

Public Feedback Form Submissions

Date Received	Public Feedback Form Comments and Questions
7/31/2023	What type of CEQA document will be prepared for this plan? Also, will the plan be considered a land use plan for purposes of CEQA? Should project proponents make sure their projects comply with the plan as part of their CEQA analysis for their projects?
7/27/2023	There should be MORE hazardous waste drop off sites. I am a senior and live in Sonoma. I'm told I have to drive north to a site in Petaluma to drop off rat poison and paint. Since that is not an option for me, I'm told by others to just dump the rat poison and I DO NOT WANT TO DO THAT, as it would pose a danger to wildlife. More drop off sites with scheduled pick-ups should be a PRIORITY!!!
7/18/2023	Section 7, page 7, last paragraph. The second half of following statement is incorrect: "A generator records on the hazardous waste manifest the quantity of hazardous waste it generates and uploads information from the manifest to DTSC's Hazardous Waste Tracking System (HWTS)." The HWTS access is limited. The generator does not upload data into HWTS. The statement needs to be revised to indicate the data in HWTS is entered by agency staff (or contractors).
7/18/2023	Section 4.2.4.2 references Tables 4.2-1 thru 4.2-4 however those tables are missing.
7/13/2023	Ryan Dominguez presented at the 7/12/2023 BES meeting. Ryan Dominguez and Diana Peebler and company are generating a foundation for trust in their work to improve haz waste management in CA and in addressing contemporary public priorities and comments. Thank you Ms. Peebler, Mr. Dominguez, and company! I hope that upper management fully support this very important work.
5/3/2023	New fee structure is exceeding difficult for federal facilities to work with as the types and volume of waste generated is now charged at an fraction of a ton yet funding is programmed based on historical volumes, always seeking to project lower amounts of waste generation; yet now more waste streams are subject to the fees. Previous range based method was superior for being in the ball-park with projections. Unsure how to project for waste streams that have lost exemptions and now subject to reporting and fees. A longer lead-in time for implementation is requested or alternative options to accommodate anti-deficiency act criteria associated with federal funding.
3/1/2023	Please forward me a draft (or link to the draft) of the HWPlan once it becomes available. I have 30 years of experience in the remediation of brownfield sites and waste management, and I can provide numerous options on how to reduce the amount of contaminated soil exported off-sites for disposal.

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2/9/2023	As an Environmental, Health and Safety Professional in industry for the past 43 years and 40 years of waste profile and manifest preparation, I would like to inquire about the possibility of providing assistance or insight for the HWPlan Team. In my opinion this concept is long overdue but may also be a duplicate of the summary of the Generators Biennial Reports and the TSDf Annual Reports. Thanks
2/7/2023	Interested in promoting additional avenues for recycling and for generator self-treatment of hazardous wastes to reduce transportation of hazardous wastes for treatment or landfilling.

HWPlan Email Submissions

Date Received	Comment/Question
8/24/2023	<p>I apologize for the delay in response. We appreciate the notification of the availability of the 2023 Draft Hazardous Waste Management Report, developed as a deliverable to comply with SB 158. We read the draft report and provide the following informal comments on the document on topics related to disposal and water quality requirements.</p> <p>California Water Code, section 13173, defines designated waste (in part) as hazardous waste that has been granted a variance from hazardous waste management requirements pursuant to section 25143 of the Health and Safety Code. California Code of Regulations, title 27, requires designated waste be disposed in Class II waste management units. The report should acknowledge this as an alternative way for hazardous waste to be disposed that DTSC may not track.</p> <p>The report includes a discussion on treated wood waste as a hazardous waste with a variance, treated wood waste is able to be disposed at a non-hazardous waste landfills as long as alternative management standards are followed (composite-lined Class II, Class III, and municipal solid waste landfills). This is a separate distinction from treating the material as designated waste.</p> <p>Further, the report includes a discussion on treated wood waste not being required to follow the hazardous waste manifest and disposal requirements, but the report does not include a similar discussion on chemically treated metal shredder residue (CTMSR). Title 22, section 662641.4, Exclusions, includes distinctions for CTMSR to be considered as not hazardous for purposes of off-site transportation and disposal as long as the CTMSR is similarly disposed in composite-lined facilities.</p>

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	<p>Water Board staff also recommend DTSC consider other treatment alternatives for certain waste streams considered to be hazardous. Water Board staff urges DTSC to consider treatment alternatives for green materials that could be considered hazardous waste based on toxicity. Water Board staff have had many discussions with DTSC and CalRecycle staff regarding materials such as unprocessed cannabis that exceed toxicity thresholds. Water Board staff urge DTSC to consider composting as a viable treatment alternative for this and similar unprocessed green materials as composting transforms the waste into a renewable product. The report indicates if all hazardous waste was to be disposed in California (rather than being transported out of state), there is 20 years of remaining capacity. While waste oil and soil are the majority of manifested waste streams, viable options for any waste streams would be beneficial to support a more circular model.</p> <p>Regarding the question on the definition of secure landfill, we are unaware of any regulation where the term is defined. Based on a search, it seems a secure landfill could be any landfill constructed to modern landfill design criteria to isolate waste from the surrounding environment.</p> <p>We appreciate the opportunity to comment on your draft document. We are happy to meet to discuss more if that would be beneficial for you. We look forward to continuing to collaborate on related topics.</p>
8/14/2023	Is there a date when comments are due on the Plan? Thank you for responding to my question.
8/10/2023	It was interesting what was presented and well thought out. But I cannot help the feeling that we (CA) are sending hazardous waste outside to other states so not to deal with the waste. I appeared to me that NMBY “Not in my backyard” was the most prominent feature. This was my impression.
7/28/2023	Hi, is there a deadline to submit comments on this draft report? Thanks.
7/26/2023	These emails need more context to generate interest. What is this report for? Who writes it?
7/19/2023	Thanks for the prompt response. I had downloaded the full report and did not realize tables were still separate as some sections (i.e. 3) did have the tables inside the full report.

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7/18/2023	<p>Greetings DTSC HW Plan Team Member, I registered for the meeting and received a Zoom invite (which I still might accept). My plan, however, was to be present (in Sacramento) on the 9th. Is there anything, in addition, I need to do to attend the “in-person”? Thank you</p> <p>I plan on thoroughly reviewing the 254-page report before attending.</p>
7/10/2023	<p>What is the status of the HW Management report that the DTSC website indicates being finalized in Spring 2023. This is all I can find:</p> <p>The first responsibility of the HWPlan Unit is to prepare a Hazardous Waste Management Report by Spring 2023. The initial report is the starting point to determine the types of information and additional research needed to generate the first hazardous waste management plan. As such, the main objectives of the first report are the following:</p> <p>Establish a baseline understanding of the management of hazardous waste in the State of California, Identify data gaps and items that require additional research, and Develop plans to fill data gaps and complete additional research.</p> <p>To help achieve these objectives, the first report will include available information regarding items such as hazardous waste streams produced in the state (waste generation, transportation, treatment, and disposal) and hazardous waste facilities that operate in the state.</p> <p>Following the initial report, the HWPlan Unit will continue to conduct research and gather information in pursuit of completing the first Hazardous Waste Management Plan by March 1, 2025.</p> <p>Thanks for your help !!</p>
5/2/2023	<p>About two years ago Dr. Yacoub came to our office and delivered a presentation on Pollution Prevention. I am wondering if he is still with the DTSC or if he has retired.</p> <p>I am looking for someone from the department to make a presentation on the same topic in June. Could you please let me know if you can direct me to someone to make my request. Thanks in advance.</p>
3/31/2023	<p>Trying to follow-up after the CUPA Conference. Presentation included a website on page 42 that produces a “404-error”. Please advise on correct address.</p> <p>https://dtsc.ca.gov/hazardous-wastemanagement-plan/</p>

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3/29/2023	<p>Good morning, I hope you're well. I'm an editor at Waste Dive covering hazardous waste. I understand DTSC is scheduled to release its 2023 Hazardous Waste Management Report this spring and possibly by the end of March. I'd like to know if DTSC has a publication date set, and whether there will be a press briefing or press access to an embargoed copy of the report. If so, I'd like to be included in that process.</p>
2/27/2023	<p>Is there a link to file the 2023 Hazardous Waste Management Report? I am on the Hazardous Waste Management Plan Department of Toxic Substances Control (ca.gov). There is nowhere to file. Can you help me?</p>
2/17/2023	<p>I've been in contact with the DTSC regarding the annual and biennial Hazardous Waste Reports. I asked about the Triennial and was told to check with the email address on this memo. The annual reports person didn't know about a triennial. The website mentioned in the memo does not have it either. Is there more information?</p>
11/1/2022	<p>Dear Hazardous Waste Management Plan Unit,</p> <p>Please see attached the Center on Race, Poverty, and the Environment and Communities for a Better Environment's comments to aid the development of the Hazardous Waste Management Plan.</p> <p>Please feel free to respond to this email if you have any questions.</p>
10/17/2022	<p>Hi, we have facility in Riverside, CA. I'm trying to look up for the proper waste storage and disposal of used sorbents, contaminated material, and other waste products must be stored and disposed of in accordance to federal, state and local regulations. We are plastic manufacturing company; we make houseware plastic products.</p> <p>We have some rags and sorbents that absorb all the hydraulic oil from the plastic injection machines. We placed it in the yellow bags (trash bags) that contains all old rags, sorbent full of oil. Need to know about proper disposal of yellow bags, we didn't want to put in regular trash compactor until we know that it's okay or not allowed to dispose of it?</p> <p>I need to find link that show about hazardous waste program that we can use to do the proper way of spill kit procedures. Thank you and look forward to hearing from you about proper of disposal.</p>

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<p>10/10/2022</p>	<p>I staff the Contra Costa County Hazardous Materials Commission. The Commission is a 14-member advisory body to the Contra Costa County Board of Supervisors on hazardous waste and hazardous materials issues. It was created in 1986 to help draft the first Contra Costa Hazardous Waste Management Plan and has been actively providing advice to the Board of Supervisors ever since. The Commission has interacted with staff from DTSC on a wide range of issues over the years, most recently on the development of policy recommendations concerning the reuse and recycling of lithium-ion car batteries.</p> <p>The Commission is very interested in your effort to develop a Hazardous Waste Management Plan for the State. They want to initiate a review of hazardous waste management in Contra Costa County to complement the findings of the Hazardous Waste Management Report that you are preparing in March, 2023.</p> <p>I would like to know if someone from your staff would be available to attend our next Commission meeting (virtually) on October 27th from 4:00 to 6:00 to provide the Commission with an overview of the scope of the Hazardous Waste Management Report, a summary of your efforts to date and a timeline for completing the report. I think the Commission will be very interested in providing input to you on the report.</p> <p>I look forward to hearing from you soon. Thank you</p>
<p>10/7/2022</p>	<p>So as a business I am only required to have the HMBP not the HWMP? And how often must be update this plan? I know I submit it annual to CERS but if after the annual recertification time if I acquire other hazardous materials how often do I update it?</p>
<p>10/6/2022</p>	<p>Hi, I was seeing if I could get some information on a Hazardous Materials Management Plan and what the difference is between that and a Hazardous Materials Business Plan? Does the industry you're in dictate what your plan consists of?</p>

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9/16/2022	<p>Hello</p> <p>I hope you are doing well in your new role regarding the development of the subject plan. I just saw and enjoyed the video and thought it was well done. I guess I am not still sure of what will be the potential outcome of the plan in terms of managing the generation of hazardous wastes and protecting health and the environment in California. Maybe you could clarify it for me.</p> <p>I have attached for you some comments I made a year ago regarding SB 673 Track 2 and the ability of DTSC to really reduce cumulative risk to communities via permit conditions with the development of these regulations. In reality, land use planning involving industry, etc. has been left to the locals for the most part. At that time, I was aware of H and SC Section 25135, but really didn't know what DTSC (your unit now) would be doing. In this document I referenced Hand SC Section 25135 and took liberties in suggesting that such an effort could possibly be used to assess options for looking at the "big picture" of managing wastes in California and potentially reducing cumulative risk and adequately protecting vulnerable communities. It seems this law could give DTSC a potential inroad in dealing with locals in their planning and overall efforts to protect the environment. I look forward to hearing back from you. Take care.</p>
8/5/2022	<p>I too am sorry that I could not attend :(- I had an important staff meeting that conflicted with it. This topic is very relevant to a campaign I am working on, and all of my co-workers are also interested and equally disappointed that they could not attend. Is there any chance of accessing a recording of the talk? Thanks.</p>
8/3/2022	<p>Hi, How are you? It's a good information from the Hazardous Waste Transportation Presentation.</p> <p>The logistics of hazardous waste is complicate if you have not worked in the private sector before. Especially, all the hazardous waste transporters would not like to provide any pricing to any governmental agency unless such agency would use the transporter's service or issue a Request For Proposal (RFP) for hazardous waste or environmental service. The easiest way to initiate the negotiation of hazardous waste transportation pricing is by comparing the use of Danger Goods Freight transportation pricing from the common carriers like UPS, USPS and FedEx. Especially, they have more networks of labor and vehicles (including both trucks and rails). Once you can determine the baseline from Dangers Good transportation pricing from these common carriers, you can then factor in the hazardous waste transportation pricing since the trucker is mostly independent contractor, who</p>

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	<p>does not bind by the prevailing wages (aka union wages or minimum wages in CA) but the per-mile or per-load charge. Therefore, the transportation cost would be factored into the actual distance due to fuel price fluctuation and incremental weathers.</p> <p>If you want to discuss more about this issue, I am happy to share what I know from my experience in private sector.</p>
7/22/2022	<p>Question: I am an Environmental compliance inspector with the City of LA and some industrial user has asked me the following:</p> <p>1) Which waste corresponds to RCRA waste code usually shipped with code 181 in California?</p> <p>2) Is there a comparison list (and definition) between RCRA and non-RCRA waste? If so , please include a link in your response.</p> <p>Thanks in advance for your clarification.</p> <p>Regards</p>
7/18/2022	<p>Your agencies have done nothing to keep the neighbors safe around this property. Nothing has been done about the sewer line leaking arsenic into the soil. There are high levels of radiation which are not background everywhere. No investigation into the storm sewer and sanitary sewer lines. There has been no offsite monitoring of the neighbors and many neighbors have cancer.</p>
7/14/2022	<p>My schedule is conflicted with our yearly Enforcement Symposium Workshop Series the 3rd Wednesday of the month.</p> <p>It would have been nice if someone would have reached out since to us, this is a topic very important to our community and we have taken much time to engage in this topic. Decades really.</p> <p>Disappointed to say the least.</p> <p>My schedule is conflicted with our yearly Enforcement Symposium Workshop Series the 3rd Wednesday of the month.</p> <p>It would have been nice if someone would have reached out since to us, this is a topic very important to our community and we have taken much time to engage in this topic. Decades really.</p> <p>Disappointed to say the least.</p>

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<p>7/9/2022</p>	<p>Is this July 20 webinar going to have any mention of actions to take regarding Santa Susana Field Lab area cleanup? Has Boeing, Nasa and doe been able to shut down all policing of themselves?</p> <p>Do you think the childhood cancer incidence ascribed to SSFL toxins in the area has efficacy?</p> <p>Does DTSC have any involvement at all with the nearby wildlife crossing over the 101? Can you comment on the status of that, even though it's not in your domain?</p>
<p>6/29/2022</p>	<p>Hi there, I am slightly confused if there is anything I need to do differently at our permanent hazardous waste collection facility regarding the Universal Waste Management Plan? Thanks.</p>
<p>6/23/2022</p>	<p>Good afternoon, I just wanted to communicate that I was actually on the call yesterday. However, by audio only. This was informative review and didn't realize how "Universal Waste" was going to be part of this particular report.</p> <p>A few questions: Clarification; the totals noted in slides 17-20 indicate that U-waste generated in California is shipped to other countries?</p> <p>When discussing batteries (lead-acid/Nicad) were totals including various industries, including Telecommunications, back-up, generator start-up batteries from vehicle repairs?</p> <p>How will the HWPlan impact the regulated community and household community, overall?</p> <p>Will LED lights (aka LED Light Tubes often now being replaced for old MCL-style tubes) be included as Universal Waste program or part of the HWPlan?</p> <p>Look forward to your reply.</p>
<p>6/2/2022</p>	<p>I need some direction / assistance in figuring out how to dispose of specimens in specimen jars that contain formalin. I have probably about 20-30 containers fairly small in size. Could someone email me with the information (do I need an account? cost? etc.) or they could contact me via phone at 760-978-5486. I appreciate the help!</p>

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5/26/2022	<p>I am an engineer working on a project and we need information regarding removing and disposing of 1200 gallons of a solution which is 90% Water and 10% ethylene glycol. This solution is currently inside the piping of an HVAC system. Can you please provide guidance on how we can remove this?</p>
4/27/2022	<p>Thanks for the chance for input. I intent to watch this process closely. I apologize in advance for my soap box comments.</p> <p>Although HHW is a small portion of the state's entire hazardous waste stream, the programs serve an important function of providing a safe opportunity for management of HHW and VSQG wastes. These programs are a mandated jurisdiction requirement to develop a program even if there is no specifics on what type of program each jurisdiction maintains. These community service program are not operated by jurisdictions at a profit thus they continue to deserve exemptions for fees and less burdensome requirements. As state in HSC 25218 (c):</p> <p>To facilitate and increase the collection of household hazardous waste and conditionally exempt small quantity generator waste, it is the responsibility of the state to provide for an expedited and streamlined permitting and regulatory structure for household hazardous waste and conditionally exempt small quantity generator waste collection and handling.</p> <p>Overburdensome regulations defeat the objectives of providing convenient and accessible collection facilities and the protection of public health and safety.</p> <p>This charge is unlike other hazardous waste generators and should be recognized in the plan.</p> <p>I can think of a number of topics that can impact HHW/Used Oil programs from development of the Hazardous Waste Management Plan (HWMP) based upon that was win the legislation including:</p> <ul style="list-style-type: none">• Part of the plan is to quantify hazardous Waste (HW) generation. HHW programs already provide more accurate reporting of this generation amount via the Form 303 which includes not only the manifest tracking but the amount of HHW sent on bills of lading. Although there are issues with the Form 303 reporting (and annual OPP reports) in terms of accuracy (story for another time), the hazardous waste management plan should not impose additional reporting or recordkeeping for HHW programs.

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- The statute requires the HWMP to reduce hazardous waste generation. This could be a good opportunity for EPR and Product Stewardship which are more established for HHW programs but more are needed. (Paint, SB212, oil, cell phones versus more needed for batteries, marine flares and the “Future of e-waste” project CalRecycle initiated)

- There is a requirement for the HWMP to review the hazardous waste criteria (testing). This was attempted many years ago with the Regulatory Stricture Update (Jesse Huff project) that got shelved (mention of this effort may make the old timers at DTSC cringe). AS indicated in the legislation, detection limits for instruments are much lower now and we could start looking for establishing much lower levels for classification of hazardous wastes(e.g. PFAS limit of 13 ppt used by the SWRCB for landfill sampling). Thus, more hazardous wastes could be added to the list without consideration for how jurisdiction will pay for these collections (Teflon pans to the HHW facility? (Paranoid, maybe)). HSC 25135 (b)(5)(C). Chemicals may exhibit hazards or toxicological impacts but may not deserve to be regulated as “hazardous wastes”.

“An assessment of additional contaminants, chemical constituents, or hazard characteristics or traits that are not currently included in the hazardous waste identification criteria, and the additional public health or environmental protections that could be achieved if those additional contaminants, chemical constituents, or hazard characteristics or traits were to be added to the hazardous waste identification criteria in the state.”

- This review of the testing criteria should look at the Aquatic toxicity test as discussed in the Retail Waste Working Group. California and Washington are the only states I believe that use the test. There was testing done by a number of District Attorneys that indicated some toothpaste, baby shampoo, vitamins and other common products failed the test. This testing protocol has not been reviewed since the 1970’s when it was established.

- There is also an issue with the “empty” determination for plastic containers that held used oil. They can meet the standard of empty with no continuous flow one day but the next day the oil will flow out in small amounts. Should this criteria be based on a time limit? This was also a recommendation of some of us in the Retail Waste Working Group as well as other issues.

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	<ul style="list-style-type: none"> • The Safer Consumer Products initiative is a great start to reducing toxicity on the front end • There may be an attempt to increase fees for DTSC to cover these efforts which is always a concern for HHW programs and their sponsoring jurisdictions. <p>These are some of the off the top of my head considerations. I am sure we will find more. I applaud DTSC for taking on this effort even if required by legislation. Please let me know if you have any questions. Let me know how it goes.</p>
4/13/2022	<p>Thank you for sending this information out. I participated in the workgroup on lithium-ion battery recycling and would love to participate in this effort as well. Please let me know what you may need from me to join this effort. Thank you.</p>
4/11/2022	<p>Greetings. The following message found its way into my spam folder and has been flagged as suspicious. Gmail gives the following warning about it: "Be careful with this message Black Rock Auto Mail could not verify that it actually came from dtsc.ca.gov. Avoid clicking links, downloading attachments, or replying with personal information."</p> <p>I called DTSC at 1-877-454-4012, and asked about this email, but they could not verify whether it is legitimate or not. So, they provided us with your email, and said to contact you about it.</p> <p>Can you let us know if this was a legitimate message? Please understand that email is easily spoofed and downloading documents from unverified sources can be extremely risky. Thanks.</p>
4/7/2022	<p>Why are you sending me this and ignoring the contamination at Hughes/Ratheon Canoga Park?</p>
4/6/2022	<p>To Whom It May Concern, Clients of ours have received a letter from DTSC say that a Hazardous Waste Report is due by March 1, 2023, and a Plan is due by March 1 2025 but there are no further details. What is required to be included in the Report and Plan? Is there a template? We need guidance on exactly what we are supposed to do.</p>

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4/6/2022	Hello, thank you for the quick response. I reviewed the link provided for additional information and from my understanding, Generators (stakeholders) are not responsible for providing additional information to facilitate the States Plan and Report. Is my assessment correct? Please let me know. Thanks.
4/5/2022	It would be nice to know which waste reports you are working on?

Appendix F: Public Feedback

Letters

2022

<u>Date Received</u>	<u>Letter (PDF link)</u>
11/01/2022	Letter from Idalmis Vaquero – Legal Fellow, Communities for a Better Environment, and Ingrid Bostrom – Assistant Director, Center on Race, Poverty & Environment

2023

<u>Date Received</u>	<u>Letter (PDF link)</u>
09/14/2023	Letter from Michael Caprio – Director Government Affairs California, Republic Services
09/15/2023	Letter from Jonathan Pruitt – Green Zones Program Manager, California Environmental Justice Alliance; Grecia Orozco – Staff Attorney, Center on Race, Poverty & the Environment; Jeni Knack – Co-Director, Parents Against Santa Susana Field Lab), Ivana Castellanos – Toxics and Plastics Campaigner, Physicians for Social Responsibility – Los Angeles
09/16/2023	Letter from John Kennedy – Senior Policy Advocate, Rural County Representatives of California
09/16/2023	Letter from Cynthia Babich – Founder and Director, Del Amo Action Committee and Florence Gharibian – Board Chair, Del Amo Action Committee
09/17/2023	Letter from Ingrid Bostrom – Assistant Director, Center on Race, Poverty & the Environment
09/17/2023	Letter from Scott J. Fulford - Associate General Counsel, Ecobat
10/18/2023	Letter from Tim Carmichael – President, California Council for Environmental and Economic Balance
10/23/2023	Letter from Robert Spiegel – Vice President, Government Affairs California Manufacturers & Technology Association; Alex Oseguera – Director of Government Affairs, California, Hawaii WM; Johan Gallo - Executive Director, California Automotive Business Council; Stefanie Scrugqs – Chief Sustainability and Health, Safety, Environment Officer, Ecobat; Jeff Baxter – Executive Vice President, World Oil; Brady Van Englen – Policy Advocate, CalChamber; Jack Monger – CEO, Industrial Environmental Association; Roger Miksad – President, Battery Council International; Skip Ricarte – President, CalRMA; Lisa Johnson – Executive Director, Chemical Industry Council of California; Christine Zimmerman – Senior Regulatory Affairs Manager, Western States Petroleum Association