



**HAZARDOUS WASTE MINIMIZATION  
SB-14 REPORTING  
DUE SEPTEMBER 1, 2011**

In 1989, California adopted legislation that requires hazardous waste generators subject to the Hazardous Waste Control Law to consider source reduction as the preferred method of managing hazardous waste. This law, proposed in Senate Bill 14 (SB-14) as the Hazardous Waste Source Reduction and Management Review Act of 1989, promotes source reduction over recycling and treatment because it avoids the generation of hazardous waste and its associated management liability. Hazardous waste generators must determine if they are subject to SB-14 every four years (1990, 1994, 1998, etc.)

**Who is affected?**

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

1. Did my facility generate 12,000 kilograms/year (26,400 pounds) or more of hazardous waste or 12 kilograms/year (26.4 pounds) or more of extremely hazardous waste in 2010?
2. Is this waste routinely generated from ongoing operations? (One-time waste streams such as demolition debris from decommissioning a production line are excluded.)
3. Does my business generate aqueous hazardous waste that undergoes on-site treatment prior to discharge to the sewer? (If you produce over 3,100 gallons/year you are subject to SB-14.)

If you answer yes to questions 1 and 2, or yes to question 3, you are subject to the SB-14 planning requirements, which include a plan, report and a summary progress report.

**What are the Plan, the Report and the Summary Progress Report?**

SB-14 requires the preparation of waste minimization documents every four years for those facilities that meet the waste generation thresholds in the reporting year. Generators are required to prepare three documents. The first document is the Hazardous Waste Source Reduction Evaluation Review and Plan (Plan). The Plan is a forward-looking document in which a generator evaluates potential source reduction/waste minimization measures for each “major” waste stream (waste streams that constitute greater than 5% of the total waste generated). The second document is the Hazardous Waste Management Performance Report (Report) and is a backward-looking document that must assess the effect of each source reduction measure implemented since the baseline year (i.e. 1998) on waste generation. The third document, the Summary Progress Report (SPR), consists of two tables and a comment page that summarizes the results of past waste minimization measures and any new waste minimization opportunities that will be implemented in the next four years.



**Dates to Remember:**

Plans are to be completed and Reports submitted no later than **September 1, 2011**. The DTSC is not sending out compliance reminders this year, but does have waste generation records based on submitted manifests and will follow up with facilities that fail to file. Don't let one of those "Failure to File" letters end up on your desk!

The evaluation and documentation required by this regulation are significant. DTSC requires that facilities go through a specific evaluation process EVERY REPORTING YEAR, and document the evaluation. Simply updating a previous year's plan does not meet the requirements.

Associates Environmental staff are available to help with all reporting requirements from determining whether or not your facility falls under SB-14 reporting or preparing the full Plan, Report and Summary Progress Reports.

Please call me at (714) 916-4996 or e-mail me at [jfieber@associatesenvironmental.com](mailto:jfieber@associatesenvironmental.com) with any questions and to determine your facility's compliance requirements.

Thank you,

Jennifer Fieber  
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