

HHWCF Basic Orientation

- Background Section
- Who am I: Charles Corcoran
- DTSC's - Regulatory Assistance Office
- I am new to HHWCF operations (Be nice, please)
- So, why am I here:
- To provide an overview
- To explain DTSC's role

Laws and Regulations

- **CALIFORNIA HEALTH AND SAFETY CODE (HSC)**
Div. 20 MISCELLANEOUS HEALTH AND SAFETY PROVISIONS [24000 - 26204]
CHAPTER 6.5. Hazardous Waste Control [25100 - 25258.2]
- **ARTICLE 10.8. Household Hazardous Waste and Small Quantity Generator Waste [25218 - 25218.13]**

The Article consists of thirteen in a hodge-podge mix of topics and order.

Laws and Regulations

- Regulations
- Title 22 California Code of Regulations
- Division 4.5, Chapter 20 and 45
- Sections 66270.60, 67450.4, and 67450.25
- In other words: Regulations establishing permits-by-rule for THHWCF and PHHWCFs.
- Other various sections for FA/FR and as referred to (mostly Chapter 12 & 15).

HHWCF Basics

- THHWCF

- Both a generator and a facility
- Operates less than 13 times per year and less than two times a month at a location.
- Plastic sheeting

- PHHWCF

- Both a generator and a facility
- Perm. - No such restriction.
- Perm. Has designed containment
- (More “TSDF-like”)

DTSC Authorities

- **25218.3** - The department may
- Authorize an HHWCF to accept HW from CESQGs
- Adopt and revise regulations for HHWCFs (limited scope)
- **25218.11.** - shall develop regulations to simplify authorization (permitting) of PHHWCFs (limited scope)
- DTSC retains its oversight role over the State HW Program
- May enforce.

DTSC's Role (or not?)

- DTSC re-organized two years ago (4/13).
- Not Again???? Yes, again..... Sigh.
- HHW became an orphan program within DTSC (I.e., It was not assigned to any part of the organization)
- Like many other orphan functions, the Regulatory Assistance Office (RAO) “absorbed the function.” (Honestly, I fell like I’ve been absorbed
- What to Expect from the DTSC RAO
- let me talk freely

DTSC's Role (or not?)

- This is part of why I am here
- I want your feedback
- Given a limited role
- How and where should the RAO focus its efforts to do the most good? (Or the least harm?)

DTSC's Role (with CUPAs?)

- Inspection and compliance is a part of it.
- There will be disagreements
- How can DTSC help resolve them?
- HHWCF operator group call
- Providing guidance on webpages
- Other ideas (I want your feedback)

Other Agencies Role's

- (DTSC Regulations and general oversight statewide)
- DEA limited to CESQGs with controlled substance's
- US EPA none really
- Cal EPA CERS creation, maintenance and updating
- Cal/OSHA general worker safety
- (DEA may not agree, EPA may say “RCRA CESQG,” Cal/EPA & Cal/OSHA as long as no injuries or deaths probably won't see 'em.)
- The above is just Charles' opinion.

Questions & Contact Info

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- Or better yet, Contact a DTSC RAO at
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