



Quarterly Report

An informative publication for members of the
California Waste Association

March 2006

CWA Sets the Standards

The CWA established the professional standards committee to help industry define technician level certifications for several hazardous waste job categories. We have had many informal conversations with training providers, regulatory agencies, TSDF, transporters and generators to determine what industry needs are not being met and how the CWA can assist in bridging the gap.

On Feb. 15, 2006 the Professional Standards Committee met via conference call to further discuss the establishment of professional standards for hazardous waste industry workers. The committee will recommend beginning this process by certifying three positions.

Lab Pack Technician level I, II and III

This position will quantify the role of a lab pack tech. by establishing the following;

Level I: A person who understands packaging, labeling and manifesting requirements for preparing a load for

shipment. Understands DOT regulations and is very familiar with placarding, hazard classes, segregation requirements, UN packaging requirements, drum handling techniques and is trained to specific lab packing job functions.

Level II: A level I who can also segregate wastes using chemicals indexes and very basic field chemistry, is familiar with profiling, manifesting, LDR's and contingency planning.

Level III: a level II that is certified in Hazcat or using other field chemistry techniques and can pass a basic field chemistry test. Subdivisions may include WMD and biological filed testing.

Hazardous Waste Driver

This position will establish training requirements that coordinate several mandatory programs along with job experience and job specific training tailored to individual vehicle needs.

This certification will be issued as: *General, Bulk*
Continued on p. 2

In This Issue

From the President

— 2 —

Manifest Changes

— 3 —

Save the Date

— 3 —

Newsletter Contest

— 3 —

Updated Websites

— 4 —

HWC Scheme Changes

— 4 —

SPCC Requirements

— 4 —

What's Up with Waste

Universal wastes, consumer goods that when discarded pose a threat to the environment, include batteries, cell phones, thermostats, mercury containing lamps and other electronic devices can be excluded from the waste universe if recycled. Because they are so pervasive, the State governs their exclusion so that consumers and business could recycle them easily and for little or no cost.

Karl Palmer, DTSC Division Chief for regulatory and program development and his staff, recently spoke at the Cal CUPA conference to a large audience explaining how exemptions have expired and as of Feb. 9, 2006 all universal waste, even from CESQG are now regulated.

In addition to the previously regulated consumer electronic devices (CRT's) an expanded category of Universal Waste Electronic Devices (UWED) which include CPU's, printers, radios, microwaves, VCRs, cell phones, cordless phones and answering machines are now regulated, as well. Palmer pointed out that a large number of these devices have been tested by State and Federal agencies and most failed TCLP and or TTLC/ STLC digestion tests.

Visit www.dtsc.gov or contact Karl Palmer for more information. Please call 916-445-2625 or e-mail at Kpalmer@dtsc.ca.gov.



From the President: CUPA Conference offers wealth of information



From Feb. 6-9 generators of waste in California may have felt like they were getting an enforcement break as hundreds of

inspectors rallied at the Hyatt San Francisco airport hotel for the 8th Annual CUPA Conference. Sponsored by the Cal CUPA forum, CAL-EPA, DTSC, OES, SWRCB and the State Fire Marshal, this event has arguably become one of the largest gatherings for regulatory training and community environmental outreach in the state. The conference alternates from Northern to Southern California allowing agencies and companies equal opportunity to attend.

The aim of this forum is to provide an avenue for the regulatory community to communicate with each other and help evolve a network

of information exchanges to assist in unifying code enforcement, review enforcement practices, discuss upcoming regulations and to distribute interpretations of current regulatory law. Note: I'm not sure how the pool tournament fit in, but it was a huge success.

The only negative comment was that the conference had over 60 classes and panel discussions making it difficult to choose which sessions to attend. Some of the choices were; tiered permitting inspector training, UST regulatory compliance training, critical manifest changes, corrective actions regulations, RCRA LQG air emissions standards, recycling exemptions and exclusions, U&E waste regulations, spill reporting, clandestine drug lab mitigation and more.

I recommended that as a generator, consultant or environmental professional you visit the Cal CUPA web page and make note of next year's

event. Sadly, this forum is not attracting as many generators or industry personnel as we would hope, even though they are the ones that directly benefit from the conference workshops and lectures. It is a unique opportunity for industry to meet those who are writing and enforcing the law in an informal setting. Many of the sessions sought audience comments to help mold upcoming regulations and enforcement policies. Think of it as not voting. If you don't vote, then you can't complain about choices made by others. Attend and be heard.

In case you missed this year's conference, I have included a sampling of the discussion topics in this newsletter. Vince Sheerer has also contributed an article about the progress made by the CWA Professional Standards Committee. Another thank you to Rosalie Skefich for submitting many informative articles. As always, we encourage the submissions of articles and paid advertising from all of our membership. E-mail info@go2cwa.org for details.

Standards from Page 1

Liquid and Bulk Solid category. Training will include: 40 hour Hazwoper, DOT, contingency planning, incident reporting, manifesting, spill response to liquids/ solids/ drums, material bracing/ blocking, field patching and repair of containers, etc.

Waste Characterization Specialist

This position will be useful for generators and industry personnel that work as dispatchers, TSDF receiving, general industry shipping and material handlers and acknowledge the need for proper characterization of hazardous and non hazardous wastes.

Training will include a firm grasp of RCRA, non-RCRA and non-hazardous waste and universal waste standards, very versed in manifesting and record keeping rules, familiar with LDR and proper treatment

methods, knowledgeable in excluded recyclable materials, storage/ labeling requirements, accumulation times, secondary containment and waste segregation. This position will also have working knowledge of contingency plans and business plan filing and regulations.

For each of these positions the CWA will establish criteria for demonstrating practical experience and the applicant will have to pass an exam in order to obtain certification. A more formal job description and training outline will follow as more work is done to quantify these industry standards.

If you are interested in voicing an opinion or wish to join the CWA professional Standards committee, please contact Vince Sheerer (vscheerer@pscnow.com).

Manifest Changes on the Horizon

As the Sept. 6, 2006 deadline rapidly approaches, the DTSC and EPA are preparing for a fundamental manifest change that will redefine the way waste is moved across the state and the country. However, with such sweeping format changes, comes concern that industry will not adequately transition as smoothly as was initially hoped.

Ann Carberry, the DTSC department head who is spearheading these changes, presented a clear picture of what lies ahead. In her presentation at the recent CUPA Conference she was forthright in expressing the need for organizations like the CWA and local CUPA's to hold as many workshops and public forums as possible to begin re-educating industry to the many challenges ahead.

Beginning in September all manifest copies will be white. Generators will need to make photocopies of the generator copy to send to the State (the new manifest does not have this as a carbon). Additionally, the generator must enter the federal waste codes, waste codes for the generating state and the receiving state on the manifest. Carberry also noted that it may be required to enter all waste codes of states the waste passes through en-route to the receiving state. There are new sections for import/ export, for rejected loads and partially rejected loads as well as alternate facilities. Those familiar with the old format will also note no transporter address, a longer manifest number, a new column for regulated materials and a host of other changes.

Most likely when Thomas Aquinas said "That which does not kill us makes us stronger," he was probably thinking about the 2006 manifest changes. Yes, it is very different and yes, it will take a lot of outreach and training to implement, but once you see it, you will understand why it is necessary.

The DTSC will be holding two workshops in March (See Below) to obtain more industry input into the new manifest before it is adopted into State law. The DTSC expects these classes to fill quickly so be sure to reserve in advance. You can reach Ann Carberry at 916-255-3660 or by e-mail at acarberr@DTSC.ca.gov

DTSC Workshops

Industry Input Regarding New Manifest

March 13th 9:30-4:30

**Cal EPA Building
1011 I Street, 2nd Floor
Sacramento**

March 15th 10-4:30

**DTSC Cypress Office
5796 Corporate Avenue
Cypress, CA 90630**

Save the Date



**LA/Orange
County
Chapter Meeting
Wed., March 22**

Holiday Inn Buena Park
Universal Waste—
Aerosol Waste Issues
Presented by Nabil Yacoub
DTSC



**Excluded
Recyclable
Materials
Workshop
May 2006**
Presented by
George
Caamano

Remedy Environmental

**21st Annual
Member-
Guest Golf
Tournament
Monday,
August 7, 2006
California
Country Club**



**Manifest Workshop
Summer 2006**

“Waste” Some Time on these Updated Websites

EPA Creates New Website for Reporting Violations

In conjunction with the celebration of the 35th Anniversary of EPA's Office of Enforcement and Compliance Assistance has developed a website to report possible environmental violations or crimes. The web site asks the person making the report to identify the name and location of the violator, the type of the release: to the air, land, water, or to workers, and whether or not the violation is ongoing. If the person making the report suspects that the event is an emergency, they will be directed to <http://www.epa.gov/epahome/emergenc.htm>.

Contaminated Site Search on DTSC Website

Would you like to know more about the agency-known contaminated sites located in a specific city, county or zip code? Try the new DTSC EnviroStar® on-line database at <http://www.envirostor.dtsc.ca.gov/public/>.

The database is similar to that of SWRCB Geotracker® for LUFT, SLIC, and DoD sites in that it provides site location map, agency project contacts, type, contaminants, history, and completed assessment and remediation activities. Types of cleanup sites include:

- Federal Superfund Sites (NPL)
- State Response Sites
- Voluntary Cleanup Sites
- School Cleanup Sites

HWC Reporting Scheme Changes

Effective Jan. 26, 2006, the existing reporting scheme for missing Hazardous Wastes of Concern (HWC) by generators has changed. HWC include:

- An explosive material, hazard division 1.1, 1.2, or 1.3
- A poisonous material, hazard division 6.1, packing group I or II
- A poisonous gas, hazard division 2.3

Upon discovering that a hazardous waste of concern is missing, and the waste at issue represents a reportable quantity or a reportable difference in type as defined in the amendment (22 CCR 66261.111), the generator shall immediately attempt to reconcile the reportable quantity or difference. If the reportable quantity or difference is not reconciled within 24 hours after it was discovered, the owner or operator shall immediately notify the Department by calling 1-800-69-TOXIC and provide the required information.

Name that Newsletter

Lately the “CWA Quarterly Report” hasn't been very quarterly. We are considering a format change to create a newsletter that is more frequent, and hopefully more current in its events.

We need a title for this new publication and we are asking for your help. If your suggestion is chosen, you will win free admission at one local chapter meeting in 2006. (Monthly meetings only, excludes workshops.)

To submit your newsletter title idea **CLICK HERE** or visit www.go2cwa.org/news_contest.html

Good News for SPCC Regulated Facilities

With two recent regulatory amendments (Dec. 12, 2005 and Feb. 17, 2006), EPA has streamlined the requirements for facilities and extended the deadline for compliance until Oct. 31, 2007. In addition, the Agency also proposes to remove and reserve certain SPCC requirements for animal fats and vegetable oils and proposes a separate extension of the compliance dates for farms. <http://www.epa.gov/oilspill/index.htm>

The main changes of the amendments include:

- Providing an option that would allow owners/operators of facilities that store less than 10,000 gallons of oil and meet other qualifying criteria to self-certify their SPCC Plans in lieu of review and certification by a Professional Engineer;
 - Providing an alternative to the secondary containment requirement, without requiring a determination of impracticability, for facilities that have certain types of oil-filled equipment;
 - Defining and providing an exemption for motive power containers; and
 - Exempting airport mobile refuelers from the specifically sized secondary containment requirements for bulk storage containers.