

CalRecycle Responses to 15-day Comments, Proposed Regulation For Form 303 Household Hazardous Waste Reporting

W – denotes a comment submitted in written format

Section/ Area	Comment Number	Commenter Affiliation	First Name	Last Name	Summary of Comment	CalRecycle Response	Revisions Needed
§18751.2.1 (b)	W06-01	RecycleMore (West Contra Costa Integrated Waste Management Authority)	Nicole	Forte	Our HHW facility collects materials from schools/colleges, non-profit organizations, CESQGs and Public Works departments in our JPA member cities. This is not “household” waste. Does the definition of “household hazardous waste” need to be redefined to include these entities?	Staff notes that the regulations were revised after the 45-day comment period to accommodate the reporting of hazardous waste collected by local government agencies that is not collected from households, by changing the term “HHW” to “materials” in various locations throughout the regulations. Please also see response to comment W04-02, 45-day matrix.	No
§18751.2.1	W06-02	RecycleMore (West Contra Costa Integrated Waste Management Authority)	Nicole	Forte	Does the word “material” need to have a definition? The regs crossed out HHW and put “material” but there is no definition associated with it.	Staff believes that the common meaning of “material” is sufficient for this regulation and the term does not need to be further defined.	No
§18751.2.2 (b)(2)(D)	W06-03	RecycleMore (West Contra Costa Integrated Waste Management Authority)	Nicole	Forte	The regs only ask for # of households participating but we record all our customers including schools, non-profits, CESQGs and city public works. Should the regs ask for these users of the facility as well?	Staff believes that it is unnecessary at this point in time to require the separate reporting of non-household participants as it may impose a burden on jurisdictions.	No
General Comment	W07-01	County of Los Angeles Department of Public Works	Pat	Proano	Recommend designing the online reporting system to allow for the sharing of information within existing local databases, such as the database our department currently uses to track Form 303 information for collection events	This comment is beyond the scope of this rulemaking.	No
§18751.2.3 (d)	W07-02	County of Los Angeles Department of Public Works	Pat	Proano	Recommend that reporting of collection through stewardship programs be consistent with reporting established for the Architectural Paint Recovery Program.	Staff believes that the reporting of materials sent to stewardship programs for management as described in the proposed regulations is compatible with the reporting requirements of the Architectural Paint Recovery Program. As the information directly available to local governments and the information available to entities like stewardship organizations may not be similar (please see response to comment W02-03, 45-day comment matrix), staff does not believe it would be appropriate for the requirements of the two reports to be identical.	No