



**SF Environment**

**Our home. Our city. Our planet.**

A Department of the City and County of San Francisco



Edwin M. Lee  
Mayor

Melanie Nutter  
Director

April 19, 2013

Emily Wang  
Materials Management and Local Assistance Division  
California Department of Resources Recycling and Recovery  
PO Box 40125  
Sacramento, CA 95812-4025

Electronic transmittal to [form303@CalRecycle.ca.gov](mailto:form303@CalRecycle.ca.gov)

Re: Proposed Regulations 18751.2-18751.2.3

Dear Ms. Wang:

SF Environment is the legal operator of the San Francisco Household Hazardous Waste Collection Facility and is responsible for submitting annual Form 303 reports for the City and County of San Francisco.

Section 18751.2.1(e) of the proposed regulation states that "waste types listed in Section 18751.2.3(a)(1-9) are defined in 49 CFR Code of Federal Regulations Section 172.101." However, there is no definition in 49 CFR for "neutral oxidizers" and "oxidizing base" (18751.2.3(a)(4)), "PCB-containing materials" (18751.2.3(a)(5)), "Reclaimable" (18751.2.3(a)(6)), "Universal Waste" (18751.2.3(a)(8)), or "Other" (18751.2.3(a)(9)).

We suggest you delete Section 18751.2.3(e) and utilize the "Guide to Complete CalRecycle Forms 303" which is annually issued with the Form 303 spreadsheet to provide clarification on material category.

Thank you for the opportunity to comment.

  
Maggie Johnson  
Senior Residential Toxics Coordinator