Under California Law SB14 and its more recent amendment, California SB 1018, hazardous waste generators are required to seriously consider source reduction as the preferred method of managing hazardous waste. According to the California Department of Toxic Substances Control (DTSC), “source reduction is preferable over recycling and treatment options because source reduction avoids waste generation costs and management liability. Source reduction also provides the best protection for public health and the environment”.

Every four years, generators that fall under specific criteria must complete three SB14 documents, (the Plan, the Performance Report and the Summary Progress Report), the law no longer requires generators to submit the Summary Progress Report to DTSC. However, the Summary Progress Report must be retained on site with the other documents. 2015 is a reporting year. Plans and reports are to be completed no later than Sept 1, 2015.

**SB14 Reporting Requirements**

To determine if your company needs to file, exempt waste streams include:

- Motor vehicle fluids and motor vehicle filters
- Lead acid batteries
- Household hazardous wastes, wastes from household collection events, and wastes separated at community landfills
- Waste pesticides and pesticide containers collected by county agricultural commissioners
- Spent munitions and ordinance
- Decommissioned utility poles
- Oil generated from decommissioned refrigeration units
- Mercury relays and low-level radioactive tubes generated from removal of telephone equipment
- Lighting wastes including ballasts and fluorescent tubes
- Hazardous wastes that are designated as universal wastes in Section 66261.9
- Waste from site cleanup and mitigation activities, including remedial investigations
- Samples and evidence from enforcement actions
- Asbestos
- Polychlorinated biphenyls (PCBs)
- Formation fluids and solids from oil, gas, and geothermal exploration and field development
- Recent legislation expands the geothermal drilling waste exemption to include (under certain conditions) wastes generated from the exploration, development, or production of geothermal energy (Senate Bill 1294, Chapter 143, Statutes of 2006)
- Demolition waste/major renovation waste
- Waste generated from emergency response actions
- Waste generated from laboratory scale research
- Medical waste

**Required SB14 Documents**

A generator who is subject to SB14 must prepare documents that describe the source reduction program the generator has developed and is implementing. For the current reporting year the following documents must be prepared by September 1, 2015.

**Source Reduction Evaluation Review and Plan (Plan)**

SB14 specifies that a Plan must be understandable and contain sufficient information to convey an understanding of the facility’s review and evaluation of potential source reduction measures. The Plan can consist of narratives, photographs, illustrations, figures and data to meet the requirements of a Plan established by SB14. The level of detail will vary from site to site. However, the Plan should contain sufficient information to enable an outside reader to understand the overall flow of materials between the processes at the site, identify the processes generating hazardous waste, and understand the facility’s review, evaluation and selection of potential source reduction measures.

**Hazardous Waste Management Performance Report (Performance Report)**

The Performance Report is a retrospective document and must include an assessment of the effect on waste generation of each waste management approach implemented since the baseline year, including source
reduction, recycling and treatment. The Report can serve as a way for the generator to share with the public all of the positive efforts to improve the management of hazardous waste at the generator’s site.

**The Summary Progress Report (SPR)**

The Summary Progress Report summarizes the result of implementing the source reduction measures identified in the generator’s previous Plan and the amount of reduction that the generator anticipates will be achieved by the implementation of source reduction selected in the current Plan. Chemical Safety’s [Waste Management Software](#) can assist you in determining reporting thresholds and to create required reports for compliance. We can also help you produce the [Waste Biennial Report](#) as well as other regulatory reports for the State of California including the annual [CERS report](#).