

Chapter 7 The Summary Progress Report

7.1 Background

The Hazardous Waste Source Reduction and Management Review Act of 1989, also known as SB 14, requires hazardous waste generators to consider source reduction as the preferred method of managing hazardous waste. SB 14 promotes source reduction over recycling, treatment, and disposal. Source reduction avoids the generation of hazardous wastes, as well as its associated management liabilities and adverse impacts to public health and the environment.

The Guidance Manual for Complying with the Hazardous Waste Source Reduction and Management Review Act of 1989 (2010 edition) explains SB 14 requirements for generators and is referenced throughout this document. Generators are strongly encouraged to obtain a copy of the Guidance Manual to determine if they are captured by SB 14 and to ensure that they satisfy all of the requirements. **The Summary Progress Report is one of the documents required by SB 14.**

SB 14 applies to generators that, by site, routinely generate through ongoing processes and operations, more than 12,000 kilograms of hazardous waste or 12 kilograms of extremely hazardous waste in a reporting year. Chapter 2 of the Guidance Manual explains the process of determining if a facility is captured under SB 14, defines terminology specific to SB 14, and lists waste streams that are exempted or otherwise excluded from SB 14 requirements. The current SB 14 reporting year is calendar year 2010.

7.2 SB 14 Reporting Requirements

Generators who are subject to SB 14 in reporting year 2010 are required to satisfy SB14 reporting requirements by September 1, 2011. Generators subject to SB 14 must conduct a source reduction evaluation at their facility and prepare the three following documents:

- Prepare and retain the Source Reduction Evaluation Review and Plan (Plan) as described in Chapter 5 of the Guidance Manual;
- Prepare and retain the Hazardous Waste Management Performance Report (Performance Report) as described in Chapter 6 of the Guidance Manual; and
- Prepare and submit the Summary Progress Report (SPR) as described herein.

As explained in Chapter 4 of the Guidance Manual, facilities that are subject to SB14 and meet the definition of a small business (California Government Code Section 11324.610) have the option to complete a Compliance Checklist in place of the Plan. In place of the Performance Report, a small business can use their most recent biennial generator report (BGR), as required by California Code of Regulations Section 66261.41.

When preparing SB 14 documents, keep in mind that the SPR is a summary of the information contained in your Plan and Performance Report, or your Compliance Checklist. For this reason, the SPR should be prepared after the Plan and Performance Report, or the Compliance Checklist, have been completed.

7.3 SPR Reporting and Submittal Requirements

SB 14 legislation mandated the preparation and submittal of the SPR starting September 1, 1999, and every four years thereafter. The submittal is done on DTSC Form 1262, as provided in this document. The form is also available on the DTSC website. The form is virtually identical to the 2006 version and requires basically the same information. DTSC Form 1262 “Summary Progress Report” consists of Table 1 and Table 2. Generators should read all the instructions carefully before completing Tables 1 and 2. **All SB 14 generators, including small businesses, are required to prepare and submit the SPR to DTSC by September 1, 2011.**

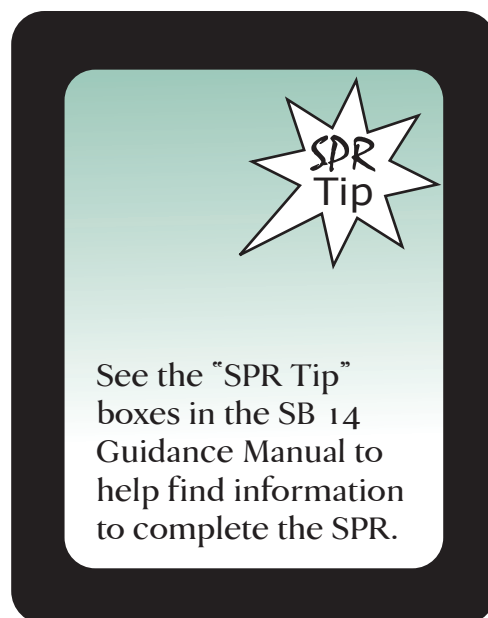
7.4 Completing the SPR

The SPR requires quantitative data and some narrative description. This is your opportunity to document your source reduction successes over the last four years. To accurately prepare the SPR, you will need to obtain information from your SB 14 Plan and Performance Report documents for the 2006 and 2010 reporting years. To help generators accurately complete the SPR, “SPR Tips” boxes were added to the Guidance Manual (in the 2006 edition).

Before completing your SPR, please note the following:

- If a generator was required to submit an SPR for 2006 and is also required to prepare one for 2010, the generator must complete information for both 2006 and 2010.
- If a generator was not required to submit an SPR for 2006, but is required to report for 2010, the generator must fill out only form items for 2010 and not for 2006. This generator is not required to complete the accomplishments portion (Section 24) of Table 2.
- If a generator was required to report only for 2006 and not for 2010, the generator is not subject to SB 14 and is not required to prepare and submit the SPR.

Table 1 of the SPR requests general information and total hazardous waste generation data for calendar years 2006 and 2010. Table 1 also requests a brief summary and comments on your organization’s historical source reduction successes and waste management practices. Your comments can also include reuse, recycling, treatment, and disposal activities. If more space is needed for comments, please add a separate page to provide complete information.



Since the information requested in Table 1 is for the entire facility, Table 1 is only completed once for each site. If your company has more than one site, and the processes and generated wastes are similar at each location, you may list the sites' individual USEPA or DTSC identification numbers on Table 1 and consolidate the waste stream types and quantities from site to site on Table 2. This will allow for a "multi-site" document instead of preparing individual SPRs for each location. Table 2, Section 24 addresses accomplishments by specific waste stream, as achieved over the last four year period 2006-2010. This information can be obtained from your 2010 Performance Report. Table 2, Section 25 addresses projections by specific waste stream covering the next four year period 2011-2014. Use your 2010 Plan to obtain information for Section 25. Since the information required for Table 2 is waste stream-specific, **a separate Table 2 must be completed for each major waste stream and for each minor waste stream for which a source reduction measure was selected.**

Note that SPR Form 1262 is also to be used to report extremely hazardous waste. If you have identified extremely hazardous waste in your 2006 or 2010 source reduction documents, please complete a separate copy of Form 1262 for your extremely hazardous waste streams and indicate their description in Table 2, Section 21.

Also note that the SPR is not confidential and OPPGT will make all SPR forms available to the public upon request. If a trade secret issue is involved, follow the procedure discussed in Chapter 8 of the Guidance Manual.

7.5 Solutions to Common SPR Mistakes

September 1, 1999 was the first time that generators subject to SB 14 were required to prepare and submit an SPR to DTSC. Following that deadline, OPPGT evaluated all submitted SPRs for accuracy and completeness. The most common mistakes were:

1. Differentiating hazardous waste streams that are pretreated on site, and then discharged, from those that are not. Hazardous waste streams that are pretreated on site, then subsequently discharged via the sewer system to a publicly owned treatment works or to a receiving water under a National Pollutant Discharge Elimination System (NPDES) permit, are now referred to as Category A wastes in the Guidance Manual. This type of waste stream was formerly called "aqueous waste." All other hazardous waste streams subject to SB 14, which were formerly called "nonaqueous wastes," are now referred to as Category B wastes. These terminology changes are relevant to Sections 15, 16, and 23 of SPR Form 1262.
2. Estimating source reduction achieved (i.e., the amount of waste reduced due to implementing source reduction).

The last item in Table 2, Section 24 of the revised SPR Form asks the generator to **estimate the quantity of waste reduced annually as a result of implementing a source reduction procedure.** No single method of estimating this value is appropriate for all facilities or all waste streams. In Chapter 6 of the Guidance Manual (2010 edition), there is a page titled "Quantify Source Reduction Achieved," which provides examples that a generator might consider using to estimate their annual waste reduction, in pounds per year, due to implementing one or more source reduction measures on a specific waste stream.

7.6 Send Completed SPR to OPPGT

By the September 1, 2011 submittal deadline, please mail your completed Summary-Progress Report Form 1262 for the 2010 reporting year to:

Department of Toxic Substances Control
Office of Pollution Prevention and Green Technology
Source Reduction Unit
P.O. Box 806, 12th Floor
Sacramento, California, 95812-0806

An electronic downloadable version of the SPR is available online at DTSC's web site, www.dtsc.ca.gov and may be submitted electronically to the DTSC's mailbox, sb14@dtsc.ca.gov, or by regular mail.

After September 1, 2011, DTSC will undertake review of all SPR forms received by that deadline date. DTSC will process and compile collected information for use in analyzing statewide hazardous waste reduction trends. The database may be used to prepare fact-sheets, industry specific assessment reports, and reports documenting the progress of California's generators towards reducing hazardous waste. DTSC will also use the collected information to estimate statewide hazardous waste source reduction progress. This information may also be used to report to the Legislature on statewide source reduction success.

7.7 Assistance and DTSC Publications

If you have questions regarding the SPR or the SB 14 program, please contact the Source Reduction Unit at 1.800.700.5854. Inquiries can also be e-mailed to sb14@dtsc.ca.gov.

Contact OPPGT if you need to obtain additional copies of this Summary Progress Report publication No. 003. SPR form 1262 and supporting instructions are also incorporated into Chapter 7 of the Guidance Manual and in the Compliance Checklist (2010 editions). OPPGT will mail printed publications upon request. The publications are also available for you to print from the DTSC web site <http://www.dtsc.ca.gov/PollutionPrevention/index.html>.

SB 14 SUMMARY PROGRESS REPORT

TABLE 1: GENERAL INFORMATION

Date _____

A hazardous waste generator subject to SB 14, is required to complete and submit Tables 1 and 2 to the Department of Toxic Substances Control by September 1, 2011. The generator is to submit only one Table 1. However, the generator may need to submit more than one Table 2. (one for each reportable waste stream).

See Summary Progress Report publication or SB 14 Guidance Manual Chapter 7, for assistance.

(1) NAME OF GENERATOR, FACILITY, or BUSINESS		<input type="checkbox"/> (1a) MULTI-SITE? (If this is a multi-site business, please check this box and list the primary EPA ID number under box #2 and add the remaining EPA ID numbers under "COMMENTS" below. Combine data for similar wastes from the multiple sites for the remainder of the Summary Progress Report).	
(2) EPA ID NO.	(3) SIC CODE	(4) NAICS CODE	
(5) STREET ADDRESS	(6) CITY	(7) COUNTY	
(8) MAILING ADDRESS	(9) CITY	(10) ZIP CODE	
(11) CONTACT NAME		(12) CONTACT PHONE	
(13) TYPE OF BUSINESS, OPERATION, or ACTIVITY			

(14) SB 14 reportable total quantities of Hazardous Waste Generated at Site, for 2006 and 2010 Reporting Years.

Reportable Total Quantities include all hazardous wastes subject to SB 14.

Do not include nonroutinely generated, exempted, or secondary wastes. Exempted and nonroutinely generated wastes are listed in Section 67100.2(c), Title 22, California Code of Regulations. Secondary waste is a hazardous waste sludge or precipitate that is generated as a result of onsite treatment of liquid hazardous waste that is sent to a POTW or receiving water under NPDES permit.

Obtain information requested below from your 2006 and 2010 Plans or Compliance Checklists.	2006	2010
(15) SB 14 hazardous waste processed onsite in a wastewater treatment unit for discharge to POTW or NPDES permit (Category A*) Total:	lbs	lbs
(16) All other SB 14 hazardous waste (Category B*) Total:	lbs	lbs
(17) All extremely hazardous waste Total:	lbs	lbs

* Category A was previously referred to as aqueous waste. Category B was previously referred to as nonaqueous waste.

(18) COMMENTS regarding hazardous waste source reduction and recycling activities (add page if needed).

TABLE 2: SPECIFIC WASTE STREAM INFORMATION

DATE _____

Complete and submit a separate Table 2 for each major hazardous waste stream and for each minor hazardous waste stream for which a source reduction measure was selected.

IDENTIFICATION

(19) NAME OF GENERATOR, FACILITY, or BUSINESS	(20) EPA ID NO.
(21) HAZARDOUS WASTE STREAM DESCRIPTION	(22) CALIFORNIA WASTE CODE CWC _____
(23) THIS HAZARDOUS WASTE IS (please check one): <input type="checkbox"/> Processed onsite in a wastewater treatment unit for discharge to POTW or NPDES permit (Category A) <input type="checkbox"/> Other SB 14 hazardous waste (Category B) <input type="checkbox"/> Extremely hazardous waste	

ACCOMPLISHMENTS

Your 2006 SB 14 Plan, Performance Report, or Compliance Checklist, has this information.

(24) Provide the following information for this waste stream:

How much waste was generated in the 2006 Reporting Year? _____ pounds

Describe the source reduction measure(s) implemented since 2006 (add page if needed): _____

Estimate when this source reduction measure was implemented: _____ Month _____ year

For this measure, what source reduction quantity was projected in the 2006 Plan: _____ pounds per year

Estimate the quantity of waste reduced annually by this measure since implementation: _____ pounds per year

(See Summary Progress Report publication or SB 14 Guidance Manual Chapter 6, to help estimate hazardous waste reduced.)

PROJECTIONS

Your 2010 SB 14 Plan or Compliance Checklist has this information.

(25) Provide the following information for this waste stream:

How much waste was generated in the 2010 Reporting Year? _____ pounds

Describe the source reduction measure selected to be implemented By 2014: (Add page if needed.) _____

Estimate when this source reduction measure will be implemented: _____ month _____ year

What is the annual projected source reduction quantity identified in the 2010 Plan? _____ pounds per year