



BES STAFF RECOMMENDATION

DATE	July 14, 2025
TO	Executive Officer and Board Members, California Board of Environmental Safety
FROM	Board of Environmental Safety Technical Team
SUBJECT	Agenda Item 3 – BES Staff Recommendations on Goals 6-9 of DTSC's Draft Hazardous Waste Management Plan

Executive Officer and Board Members,

The Department of Toxic Substances (DTSC) issued the draft Hazardous Waste Management Plan (Plan) in March 2025. The Technical Team has reviewed the Plan and has the following recommended revisions for goals 6 through 9:

Plan Recommendation 6.3: Revise text to state: Conduct an evaluation of the aquatic toxicity test method in accordance with the requirements of HSC 25141.1 to remain current with science, technology, and analytical methods and protective of human health and the environment

Plan Recommendation 6.6: Revise language to better clarify the meaning and intent of this recommendation

Plan Recommendation 7.1: Revise to select particular waste streams for evaluation, and to specify the intent of the evaluation

Plan Recommendation 7.3: Revise:

- To be more explicit as to which waste streams will be reviewed by the 2028 timeline

Link to Appendix P and explicitly note that the 2028 timeline relates to the next planning cycle in which data and recommendations will be presented

Plan Recommendation 7.4: Add CalRecycle and the Water Board as potential partners

Plan Recommendation 8.1: Revise timeline to 2027

Plan Recommendation 8.3: Add CalRecycle as a potential partner

Plan Recommendation 8.4: Add that this recommendation enables DTSC to close data gaps for source reduction



Plan Recommendation 8.5: Revise:

- To state “Evaluate characterization studies performed by CalRecycle on the types and amounts of household hazardous waste that arrive at non-hazardous waste management facilities (e.g. material recovery facilities, non-hazardous waste landfills, and transfer stations)”;
- Add a subpart “a” to include outreach to educate the public on household hazardous waste;
- Add Environmental Justice (EJ) as a focus area, in that outreach would benefit all communities, primarily those most vulnerable

Plan Recommendation 9.1: Revise Appendix Q (last paragraph) to change the term “interagency” to “intra-agency”

Plan Recommendation 9.3: Add CalRecycle as a potential partner; Remove BES from potential partners

The technical team believes these Plan revisions would make the document more understandable to the public and clearly express the true intent of the goals/recommendations.

BES Technical Team

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