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LOS ANGELES COUNTY
SOLID WASTE MANAGEMENT COMMITTEE/
INTEGRATED WASTE MANAGEMENT TASK FORCE
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February 28, 2018

Ms. Barbara A. Lee, Director
California Department of Toxic Substances Control (DTSC)
P.O. Box 806
Sacramento, CA 95812-0806

Dear Ms. Lee:

SAFER CONSUMER PRODUCTS PROGRAM – DRAFT 2018-2020 PRIORITY PRODUCT WORK PLAN

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) appreciates the opportunity to offer comments on the DTSC's draft Three Year (2018-2020) Priority Product Work Plan (Work Plan),

http://www.dtsc.ca.gov/SCP/upload/Draft_2018-2020_Priority_Product_Work_Plan.pdf

http://www.dtsc.ca.gov/SCP/upload/Draft_2018-2020-PPWP_Presentation.pdf

The Task Force has reviewed the draft Work Plan and offers the following: (a copy of which is being submitted electronically to

<https://calsafer.dtsc.ca.gov/workflows/comment/?cpid=12737>)

Solar Panels

Since the use of roof solar panels in residential, commercial, industrial, and school buildings is expected to increase significantly in the next few years, the draft Work Plan needs to be expanded to address solar panel wastes, which contain heavy metals such as silver, copper, lead, arsenic, cadmium, and selenium that may be classified as hazardous wastes at certain levels. SB 489 (2015) authorizes DTSC to adopt regulations to designate used or spent solar panels that are hazardous wastes as universal waste. The Task Force

encourages the DTSC to develop and adopt such regulations, in concert with the “product stewardship” concept, to facilitate the management of solar panels. Until the new regulations are adopted, solar panels exhibiting traits of hazardous waste, as mentioned above, must be managed as such and therefore should be included as a part of this Work Plan.

Lithium-Ion Batteries

During the past few years, the use of Lithium-Ion Batteries has expanded significantly in toys, cell phones, portable/non-portable electronic devices, airplanes, electrical cars, etc. Needless to say, the use of these batteries is becoming more prevalent in America’s way of life. However, Lithium-Ion batteries have demonstrated that they may be subject to fires and explosions as well as containing corrosive materials, all designated as “hazardous” by the DTSC since they negatively impact public health and safety, and our environment (as an example, click on the link below). As such, the Work Plan needs to be expanded to include Lithium-Ion batteries.

<https://www.youtube.com/watch?v=zce3bFKnkVU>

Lead Acid-Batteries

The Task Force supports inclusion of Lead Acid-Batteries in the draft Work Plan. However, it should be recognized that over 96% of these batteries are currently being recycled. The Task Force urges steps to be taken to insure that new batteries using emerging technologies be safely deployed, managed, collected, and recycled.

Pursuant to Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989 (Assembly Bill 939), the Task Force is responsible for coordinating the development of all major solid waste planning documents prepared for the County of Los Angeles and the 88 cities in Los Angeles County with a combined population in excess of ten million. Consistent with these responsibilities and to ensure a coordinated and cost-effective and environmentally sound solid waste management system in Los Angeles County, the Task Force also addresses issues impacting the system on a countywide basis. The Task Force membership includes representatives of the League of California Cities-Los Angeles County Division, City of Los Angeles, County of Los Angeles Board of Supervisors, waste management industry, environmental groups, the public, and a number of other governmental agencies.

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The Task Force respectfully requests that the DTSC consider the mentioned comments/recommendations and advise the Task Force of the decision and outcome of the draft Work Plan. The Task Force further requests to be provided with a copy of the draft Work Plan when available.

Thank you for your consideration. Should you have any questions regarding these comments, please contact Mr. Mike Mohajer, a member of the Task Force, at MikeMohajer@yahoo.com or at (909) 592-1147.

Sincerely,



Margaret Clark, Vice-Chair
Los Angeles County Solid Waste Management Committee/
Integrated Waste Management Task Force and
Council Member, City of Rosemead

LC:mg

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cc: California Department of Toxic Substances Control (Francesca Negri, Rob Brushia, and Meredith Williams)
CalRecycle (Scott Smithline, Howard Levenson, Mark de Bie)
League of California Cities
League of California Cities, Los Angeles County Division
California State Association of Counties
Each Member of the Los Angeles County Board of Supervisors
Sachi A. Hamai, Los Angeles County Chief Executive Officer
Each City Mayor/Manager in the County of Los Angeles
South Bay Cities Council of Governments
San Gabriel Valley Council of Governments
Gateway Cities Counsel of Governments
Southern California Association of Governments (Frank Wen)
Each City Recycling Coordinator in Los Angeles County
Each Member of the Los Angeles County Integrated Waste Management Task Force
Each Member of the Task Force Alternative Technology Advisory Subcommittee
Each Member of the Task Force Facility Plan Review Subcommittee