October 10, 2012

California Department of Toxic Substances Control
Office of Legislation and Regulatory Policy
P. O. Box 806
Sacramento, CA 95812-0806
Submitted via e-mail to: gcregs@dtsc.ca.gov

RE: Comments on Draft Regulations for Safer Consumer Products

Dear Director Raphael:

The County of Santa Barbara strongly supports the development of a Green Chemistry program in California to identify “Chemicals of Concern” and reduce toxic chemicals at the source. The stream of products requiring special end-of-life management is growing every year, and local government household hazardous waste (HHW) collection programs bear the burden of managing them at a substantial cost. As such, we are very supportive of California’s Safer Consumer Products Program that will promote the re-design of these problem products.

While we generally support DTSC’s proposed regulations, we request that you consider the following modifications:

(1) End of life management requirements – Proposed stewardship plans (page S8, starting on line 1) should be posted on the DTSC website, and DTSC should invite input from local government agencies and the public prior to approving the plans.

(2) Municipality costs – DTSC should add “cost to municipalities” as a prioritization factor in determining which chemicals will first undergo an alternatives analysis. By removing problem chemicals from products, HHW programs will have fewer products to manage, resulting in significant cost savings to taxpayers and ratepayers. Statewide, these cost savings could equal tens of millions of dollars.

We look forward to DTSC’s continued leadership in making California a world leader in producer responsibility systems that drive green design and reduce the use of hazardous materials.

Sincerely,

Mark Schleich
Deputy Director, Public Works Department