



# Would You Survive a Dumpster Dive?



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KPA

# Your Dumpster



# Industry Misconceptions

- We spray Waterborne – We're Good
- Our trash gets separated
- Our trash isn't public property
- I've passed all my inspections – I'm Good
- I don't operate in California – I'm Good
- We are too busy to worry about hazardous waste or our trash



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# It Starts At the Top

<https://www.epa.gov/enforcement>



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# Multi State Enforcement Actions

- District and State Attorney Driven
- Generator Hazardous Waste Violations
- Statewide to Nationwide Expansion
- New York and Connecticut follow California
- Arkansas follows suit



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# California DA Enforcement

2008 – 2013: 55 Businesses with Enforcement Action

Millions of Dollars in Fines issued

Multi-Year Inspection Requirements after Fines



# The Automotive Industry



# Fine Amount for One Container

One Container in the Trash = Three Penalties

Civil penalties of up to \$25,000 per day per violation under Health and Safety Code

Civil penalties of up to \$10,000 per violation under Unfair Competition Laws

Civil penalties of up to \$2,000 per violation under California's Hazardous Materials Release Response Plans and Inventory

**Fine Amount Per Container = \$ 29,500 x Number of Dumpster Pickups x Number of Locations**



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# Your Responsibilities

Storing  
Waste

Labeling  
Waste

Managing  
Hazardous  
Waste

Waste  
Pick-up

Inspecting  
Waste Areas

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# The Right Partnerships are Important

- Local presence working with the local state agencies
- Lobbying at a Federal and State Level
  - State Regulations
  - Silica Regulation
- Frequent onsite presence at your facilities
- Online training that is up to date and current

[Department of Toxic Substances Control - Automotive](#)



**TRASH ONLY**

**OK ✓**



**NOT OK**



**BUENO ✓**

**NO BUENO**

**BASURA SOLAMENTE**