

Small Business Compliance Advisory Committee

to the Pennsylvania Department of Environmental Protection

PO Box 8468

Harrisburg, PA 17105-8468

December 10, 2012

Michael L. Krancer
Secretary
Department of Environmental Protection
Rachel Carson State Office Building
P.O. Box 2063
Harrisburg, PA 17105-2063

Re: Proposed Rulemaking for Amendments to 25 Pa. Code Chapters 271 and 284 (relating to municipal waste management—general provisions; and infectious and chemotherapeutic waste)

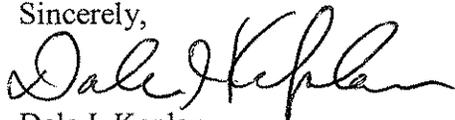
Dear Secretary Krancer:

The Small Business Compliance Advisory Committee (Committee) discussed the proposed revisions to Chapters 271 and 284 at its October 24, 2012, meeting. The Committee voted 8-0-0 during the meeting to provide a letter to the Environmental Quality Board regarding the proposed revisions to the Infectious and Chemotherapeutic Waste Regulations. Due to time constraints the details of the letter were to be decided by the Committee via discussions outside of the meeting itself.

It is the understanding of the Committee members that these proposed revisions will align Pennsylvania regulatory requirements with federal regulations and the requirements of neighboring states. These changes will make it easier for small and rural health facilities to comply with regulatory requirements for the management of their medical waste, while maintaining the same level of protection for public health and safety and the environment.

Although the Committee supports these amendments which are expected to improve efficiency and reduce costs for the industry, we strongly recommend that the Department provide outreach and education specifically to small business owners about the changes well in advance of their adoption so they have adequate time to prepare for the new requirements, such as changes to labeling and manifest requirements.

Sincerely,



Dale I. Kaplan
Chair

cc: Susan Foster, PA DEP BAQ, SBCAC Liaison
Ali Tarquino Morris, PA DEP BWM
Michele Tate, PA DEP Regulatory Coordinator

Received

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Compliance & Enforcement Division