Bureau of Waste Management
Non-Regulatory Update

Solid Waste Advisory Committee
September 16, 2022

Tom Wolf, Governor
Ramez Ziadeh, Acting Secretary
• Derek Bartram
• Solid Waste Program Specialist (11/22/2021)
• BWM Program Development and Technical Support section (PDTS)
• Technical Guidance Coordinator
• Web Coordinator
• BWM currently has $\geq 50$ TGDs
• Conducted search of BWM external webpages and eLibrary to catalog TGDs
• Spreadsheet was provided to Divisions for feedback during Winter 2022
• Responses indicated that updates are needed to $\sim 32$ TGDs
• TGD review was handled by PDTS
• Representatives from each of the six regions and PDTS reviewed TGDs in Spring/Summer 2022
• Comments received did not indicate need for substantive changes to TGDs
• Consulted with Environmental Cleanup and Brownfields about Bureau of Land Recycling and Waste Management TGDs
Non-regulatory Agenda Goals

• Ten (10) TGDs are to be reviewed and routed for publication within next 6 months in Q4 2022 and Q1 2023
• Only minor revisions anticipated (i.e., grammar fixes, updates, etc.)
• Today’s purpose is to discuss 5 TGDs due for routing in Q4 2022
Minor Revisions to TGDs

• According to the “Standard Operating Procedure for the Development & Management of Technical Guidance Documents”:
  – Consultation with the Advisory Committee regarding minor revisions is left to the discretion of the Program deputy
  – Don’t need to be published as a draft
  – Don’t include public comment period
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<th>Title</th>
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<tr>
<td>250-3120-320</td>
<td>Execution of Release Forms</td>
<td>10/25/1990</td>
<td>2</td>
<td>2022/4th</td>
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<tr>
<td>250-4000-001</td>
<td>Citing Inspection Violations</td>
<td>09/17/2005</td>
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<td>250-4000-003</td>
<td>Violations Requiring an Extended Period of Time to Correct</td>
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<td>250-4110-001</td>
<td>Notices of Violations</td>
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<td>Calculation of Civil Penalties</td>
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<td>Program Implementation Guidance</td>
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<td>Performing Municipal and Residual Waste Facility Inspections</td>
<td>09/17/2005</td>
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<td>258-2000-764</td>
<td>Residual Waste and Special Handling Waste Streams</td>
<td>02/12/2005</td>
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</table>
Purpose: Establishes procedure for BWM employees when asked to sign a waiver of liability or release from liability as a condition to enter the premises for the purpose of conducting an inspection.

Execution of Release Forms (250-3120-320)
• Purpose: To establish a uniform methodology across all DEP regions for citing violations within municipal, residual and hazardous waste programs.

• Citing Inspection Violations (250-4000-001)
• Purpose: To ensure that violations are corrected within 180 days from date of occurrence and that uncorrected violations become the subject of an enforceable document in a similar fashion across all DEP regions.

• Violations Requiring an Extended Period of Time to Correct (250-4000-003)
Notices of Violation (250-4110-001)

• Purpose: To establish a formal methodology to ensure that all BWM inspectors in all DEP regions across the Commonwealth cite similar violations in a similar manner, and that all inspected regulated facilities are notified of cited violations as soon as possible.

• Notices of Violation (250-4110-001)
• Purpose: Provides policy and procedure for the calculation of civil penalties so that civil penalties are calculated uniformly Statewide within the Bureau of Waste Management.

• Calculation of Civil Penalties (250-4180-302)
Questions?

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