

RECYCLING TECHNICAL ASSISTANCE

Project #513

FINAL REPORT

**CHARLESTOWN TOWNSHIP
CHESTER COUNTY, PENNSYLVANIA**

MANDATED RECYCLING IMPLEMENTATION



SEPTEMBER 2012

**Sponsored by the Pennsylvania Department of Environmental Protection through the
Pennsylvania State Association of Township Supervisors**

RECYCLING TECHNICAL ASSISTANCE
Project #513

FINAL REPORT

CHARLESTOWN TOWNSHIP
CHESTER COUNTY, PENNSYLVANIA

MANDATED RECYCLING IMPLEMENTATION

Project Completed By:



Gannett Fleming

PO Box 67100

Harrisburg, PA 17106-7100

717.763.7212 x2538

sdeasy@gfnet.com

1.0 STATEMENT OF PROBLEM

This study was conducted for Charlestown Township in Chester County, Pennsylvania under the Recycling Technical Assistance program that is sponsored by the Pennsylvania Department of Environmental Protection (PADEP) through the Pennsylvania State Association of Township Supervisors (PSATS).

The Township requested a solid waste expert to assist the Township in implementing a mandated curbside recycling program to comply with Act 101 of 1988. The primary focus of this project was to identify areas where the current curbside program and supporting ordinances can be refined to assure compliance with PA recycling law.

2.0 SUMMARY OF WORK

The following subsections summarize the work conducted by Gannett Fleming under the approved project tasks.

2.1 Background Information

Charlestown Township was recently mandated by the Pennsylvania Municipal Waste Planning, Recycling and Waste Reduction Act of 1988 (Act 101 of 1988) to implement curbside recycling. The Township's population (5,671 according to the 2010 US Census) and population density (over 300 persons per square mile) exceeds the thresholds set forth in Act 101. Similar to many other Chester County municipalities, the Township already requires recycling via municipal ordinance and utilizes a "private subscription" waste management system.

In the existing private subscription system, Township residents individually contract with one of several local haulers that are registered with the Township. Township Recycling **Ordinance No. 2009-153** regulates collection of municipal waste and recyclables from residences, and commercial, industrial and institutional establishments.

2.2 Existing System and Study Approach

At least four private haulers collect waste and recyclables in the Township. These private hauling companies primarily determine how services are delivered to their customers. The haulers determine collection days, trash and recycling container types, educational materials and other services. Some requirements, like what recyclable materials must be collected separately from municipal waste, are reinforced by the Township's Recycling Ordinance. At this time, the Township wishes to continue a private subscription waste collection system. This evaluation identifies Act 101 of 1988 compliance deficiencies and recommends changes to improve the waste management program.

2.3 Existing System Act 101 of 1988 - Compliance Evaluation

Curbside recycling is not new to Charlestown Township. The Township already complies with many of the Act 101 of 1988 requirements and PADEP policies and guidelines. Based on our review, **the Township complies with many core components of Act 101 of 1988 as described:**

- The Township Manager is the designated recycling coordinator.
- The Township's revised Recycling Ordinance NO. 2009-153 specifies the separation of recyclables from solid waste disposal for the purpose of recycling at an approved processor.
- Provisions contained in Ordinance NO. 2009-153 prohibit the burning of recyclable materials.
- Hauling companies are required to report recycling quantities on a quarterly basis to the Township. The Township reports recycling quantities to the Chester County Solid Waste Authority on or before February 15th of each year.
- The Township provides residential recycling education at least twice per year, once every six months as follows:
 - On an ongoing basis the Township posts recycling program information on the Township website: www.charlestown.pa.us
 - PADEP accepts website information as one (1) of the two (2) required educational distributions
 - The Township issues a newsletter at least once per year containing residential recycling information; business recycling information is in the process of being added.

Based on our review, the Township **does not comply or does not fully comply with Act 101 of 1988 in the following areas:**

- Curbside leaf waste collection is required by Recycling Ordinance NO. 2009-153 to be separated for collection. However, there is no information that describes the Township's leaf waste collection frequency requirements or otherwise confirms that all private haulers collect leaf waste at least once in the spring and once in the fall in accordance with Act 101 of 1988 and PADEP policy. Curbside leaf waste collection is supplemented by a local yard waste drop-off program:
 - The Borough of Phoenixville allows Charlestown Township residents to drop-off yard wastes for the purpose of recycling at 18 South 2nd Avenue in Phoenixville. The site is open from 8 a.m. to 4:00 p.m. year round and open on Saturdays from March 1st through November 30th from 7 a.m. to 3 p.m. The Township needs to document that residents are authorized & participate in the program.

- Additional commercial recycling education is required.
- A recycling enforcement program is not in place.

3.0 SOLUTIONS

Based on the evaluation of the existing private subscription residential curbside waste collection system, Charlestown Township substantially complies with most sections of Act 101 of 1988, including the provisions of Act 140 (2006) regarding Act 101, Section 904 Performance Grant Eligibility. To assure continued Act 101 of 1988 compliance, the Township should:

- Work cooperatively to inform haulers, business owners, multi-family dwelling owners and PADEP on recycling implementation and responsibilities as a mandated recycling community.
- Update, streamline, and keep accurate documentation of solid waste and recycling activities for the residential, commercial, industrial, institutional and multi-family recycling programs and make documentation available to PADEP upon request.

Additional guidance on recycling requirements affecting the Township is provided in **Appendix, Act 101 (1988) and Act 140 (2006) Guidance**.

3.1 Recommended Solutions/Course of Action

The following recommendations are separated by categories and are developed to guide the Township in its compliance with Act 101 of 1988.

BUSINESS RECYCLING

- Update the recycling program as follows to comply with the business/commercial sector requirements specified by Act 101 of 1988 and PADEP Policy:
 - To meet business recycling education requirements, add a “**Business Waste & Recycling**” area to the Township’s website.
 - Revise the Non-Residential Use & Occupancy Application to include recycling requirements and state the Township will request proof of a waste and recyclables hauler annually. The form should be downloadable from the Township website under the Business Waste and Recycling tab (see **Appendix, Revised Non-Residential Occupancy Application**).
 - Distribute a business recycling notice letter introducing businesses to Act 101 recycling requirements and business recycling resources. Businesses should be required to contract with a private hauler for recycling service as required by the Township Recycling Ordinance.

- Include business recycling and recycling requirement information in Township newsletters at least once per year. (Note: the requirement states once every six months, but if the website recycling information is posted, once is sufficient).

EDUCATION & WEBSITE UPDATES

- Update the recycling program as follows to comply with the education procedures specified by Act 101 of 1988 and PADEP Policy:
 - Distribute residential recycling information to all households once every six months and within 30 days of any change to the recycling program that affects the customer.
 - NOTE: PADEP accepts website information as one of the two required educational distributions per year.
- Improve website leaf waste and compost information including:
 - Delete the “compost” tab which has no content.
 - Change “Seasonal Yard Waste Disposal” to “Yard Waste Collection & Composting”. Add at the top of the information of this tab a section titled “Yard Waste Collection” that includes the Act 101 requirements and the stated collection frequency for leaf waste that will be specified by the Township. If allowing multiple haulers to set their own leaf waste schedules is difficult to implement, the Township can specify the leaf waste collection schedule that is offered throughout the Township.
- Improve website business information with specific changes including:
 - Under the business area add the language:
 - “Business recycling is required by Pennsylvania law and is also beneficial to the environment since it reduces pollution while preserving natural resources.”
 - “As mandated by Act 101, all commercial and institutional entities are required (at minimum) to recycle high-grade office paper, aluminum cans, corrugated paper and leaf wastes. The Township’s Recycling Ordinance specifies these entities to contract, at their sole cost and expense, for separate collection of Refuse and Recyclable Materials.”
 - Include links to the Recycling Ordinance and links to www.proprecycles.org and other business recycling resources/websites.

ENFORCEMENT

- Update the recycling program as follows to comply with the enforcement procedures specified by PADEP:
 - The Recycling Coordinator, codes enforcement officer and/or other Township designees should periodically conduct curbside recycling

assessments. Some inspections can be performed from the vehicle as “windshield surveys”; to see who is or is not putting out recyclables, and to make general observations regarding curbside practices.

- The Township should contact the private haulers and address the following:
 - Determine what haulers do or don’t do now to encourage (passively enforce) waste and recycling program participation.
 - Request customer lists to validate residential participation.
 - Develop notification stickers, tags, or hangers to be distributed by the Township and by hauling company drivers (see **Appendix, Draft Hauler Letter**). The notification stickers will be used to educate residents on proper handling practices and serve as a passive enforcement strategy. For example, a tagged container may indicate “contains non-recyclables” and be left at the curbside to demonstrate contaminated recyclables is unacceptable and will not be collected.
- The letter to haulers inviting them to participate in a meeting is included in **Appendix, Draft Hauler Letter**.
- The Township should revise the Hauler Registration Form with reference to Act 101 of 1988 and clarification on leaf waste collection and documentation requirements (see **Appendix, Revised Hauler Registration Form**).

ORDINANCE REVISIONS

- The Township could improve clarity regarding its waste program via updates to the Recycling Ordinance and should consider the following:
 - Designate leaf waste collection days in accordance with Act 101, specifically requiring haulers to collect and recycle segregated leaf waste and provide documentation of leaf waste disposal at an approved facility.
 - In addition to the existing mandate of all residents to secure a hauler, add language that the Township is authorized to require proof (e.g. trash bills).
 - Hauler customer list will need to be obtained to determine what households are non-compliant.
 - If curbside enforcement is not accomplished by using notice tags/stickers distributed by designated Township staff and by the haulers, then consider incorporating a streamlined enforcement program into the Recycling Ordinance that would operate as follows:
 - Designate a Township code enforcement officer or other designee to issue warnings and citations for violation of the Township Recycling Ordinance and Act 101 of 1988. The intent would be to issue warnings initially to curb the behavior.
 - Develop pre-made notification cards that can be hung or stuck on curbside refuse or recycling containers. The notification would include check boxes with a number of basic citation offenses:
 - Indicate “Warning” or “Violation”

- Disposing recyclables as trash
- Containers left at curbside (e.g. for multiple days)
- Unacceptable materials (e.g. oversized goods)
- Unacceptable materials in recyclables
- Use a citation amount range from \$10 to \$25 maximum
- Include a signature area at the bottom stating, “I _____ plead guilty to the above noted offense”
- Indicate where to remit payment
- Indicate the ability to appeal, and provide reference to scheduling a hearing at the courthouse
- Assure pertinent information from the updated ordinance including recyclables handling procedures for commercial and residential establishments are clearly posted on the website.

ELECTRONIC FILES

The Township needs to develop and utilize an organized filing structure to keep pertinent waste and recycling program files and information on hand to be made available to PADEP upon request. Key information includes:

- Recycling Ordinance
- Proof of residential education distributed once every six months
- Proof of commercial education distributed once every six months
- Proof of an enforcement program
- Authorization to utilize the Phoenixville Borough compost site
- Proof haulers collect leaf wastes at least once in the spring and once in the fall
- Agreement with Phoenixville Borough to utilize yard waste drop-off site

3.3 Conclusion

Charlestown Township of Chester County substantially complies with Act 101 of 1988 and PADEP waste and recycling guidelines. However, with limited staff it will be challenging to obtain the required information from multiple hauling companies and enforce the waste system to assure each hauler and all household comply. The Township must improve documentation, commercial recycling education, enforcement, its leaf waste collection program and validate that all residents contract with a hauler. To comply with Act 101 of 1988, Act 140 and PADEP policies. The Township should consider using the municipal bidding process to cost effectively streamline the waste system and utilize a single waste company to facilitate meeting and enforcing Act 101 waste management requirements.

APPENDIX

**Act 101 of 1988 and Act 140 (2006) Guidance
Revised Non-Residential Occupancy Permit
Revised Hauler Registration Form
Draft Hauler Letter**

ACT 101 (1988) and ACT 140 (2006) GUIDANCE FOR CHARLESTOWN TOWNSHIP

Recycling is Pennsylvania law, and “mandated” municipalities are required to operate recycling programs in a manner consistent with the requirements of Act 101 (the Municipal Waste Planning, Recycling and Waste Reduction Act of 1988) and Pennsylvania Department of Environmental Protection (PADEP) regulations, policies and guidelines. Charlestown Township in Chester County is mandated by Act 101 to implement a curbside recyclables collection program for residential establishments based on the municipal population criteria established by the Act. Act 101 does not specifically require the Township to conduct curbside collections of waste or recyclables. However, private sector collection companies must provide recycling services in a manner consistent with Act 101 of 1988, as regulated locally via municipal ordinance.

Under Section 1501 of Act 101, Pennsylvania municipalities (other than counties) are mandated to recycle based on population as follows:

- (1) Municipalities with populations of at least 10,000 must implement curbside recycling programs within two years of the effective date of Act 101 (by 1990).
- (2) Municipalities with populations between 5,000 and 10,000 and having more than 300 persons per square mile must implement curbside recycling programs within three years of the effective date of the Act (by 1991). At 5,671 residents, this is the population criteria resulting in Charlestown Township’s mandate.
- (3) Population of municipalities shall be determined based on the most recent decennial census by the Bureau of the Census of the United States Department of Commerce. Municipalities that attain these population levels (and density, if appropriate) based on a new census become subject to Act 101 recycling requirements.

Section 304 of Act 101 explains the “Powers and duties of municipalities other than counties”. This section states the recyclable material reporting requirements for mandated municipalities as follows:

- (1) On or before February 15th of each year, each municipality other than a county that is implementing a recycling program shall submit a report to the county in which the municipality is located. The report shall describe the weight or volume of materials that were recycled by the municipal recycling program in the preceding calendar year.

CHAPTER 272 OF THE PADEP MUNICIPAL WASTE REGULATIONS

Under Act 101, mandated municipalities must establish and implement a source-separation and collection program for recyclable materials in accordance with Section 1501 of the Act (and as further defined in Chapter 272 of the PADEP Municipal Waste Regulations). The following information outlines Act 101/Chapter 272 requirements related to recycling for mandated communities in Pennsylvania.

Program Elements (§ 272.421 of Chapter 272)

The source separation program shall include, at a minimum, the following elements:

- (1) An **ordinance** or regulation adopted by the governing body of the municipality, in accordance with § 272.422 of Chapter 272 (relating to municipal ordinance).
- (2) A **scheduled day** during which separated materials are to be placed for **collection at the curbside**. Collection shall be **at least once per month** for materials other than leaf waste. Collection for leaf waste shall be scheduled as appropriate (see guidance later in this appendix on PADEP's policy for minimum acceptable collection frequency of leaf waste). If no curb exists, separated materials shall be placed at a location similar to the curb where they may be collected easily.
- (3) A **system**, including trucks and related equipment, that collects recyclable materials from the curbside or similar location at least once per month from each residence or other person generating municipal waste in the municipality.

PADEP generally recognizes three basic systems that municipalities can use to provide mandated curbside collection of recyclables:

- Collection of recyclables by the municipality and municipal workers.
- Collection of recyclables by one private collection company (in some cases more than one company) under a contract with the municipality.
- Collection of recyclables by any number of private collection companies under private subscription with residents, pursuant to municipal recycling requirements established by the municipality.

- (4) A public information and **education program**, in accordance with § 272.423 of Chapter 272 (relating to public information and education).

- (5) Provisions for the recycling of collected materials.

Municipal Ordinance (§ 272.422 of Chapter 272)

(a) The ordinance or regulation adopted by the governing body of the municipality shall contain the following requirements:

- (1) **People** shall separate **at least three materials** from municipal waste generated at their homes, apartments and other **residential** establishments, and shall store the materials until collection. The three materials shall be designated in the ordinance, and shall be chosen from the following:

- Clear glass
- Colored glass
- Aluminum
- Steel and bimetallic cans
- High-grade office paper
- Newsprint
- Corrugated paper
- Plastics

- (2) Persons shall separate leaf waste from municipal waste generated at their homes, apartments and other residential establishments until collection, unless those persons have otherwise provided for the composting of leaf waste.
- (3) Persons shall separate these materials from **commercial, municipal or institutional** establishments and community activities, and store materials until collection:
 - High grade office paper
 - Aluminum
 - Corrugated paper (cardboard)
 - Leaf waste

The ordinance may designate additional materials for recycling by these establishments.

(b) The ordinance shall allow an owner, landlord or agent of an owner or landlord of multifamily rental **housing properties with four or more units** to comply with its responsibilities under this subchapter by establishing a collection system for recyclable materials at each property. The collection system shall include suitable containers for collecting and sorting materials, easily accessible locations for the containers and written instructions to the occupants concerning the use and availability of the collection system. Owners, landlords and agents of owners or landlords who comply with the ordinance under this subsection are not liable for the noncompliance of occupants of their buildings.

(c) The ordinance shall exempt persons occupying commercial, institutional and municipal establishments within its municipal boundaries from the ordinance if the following requirements are met:

- (1) The persons have otherwise provided for the recycling of materials that they are required by this subchapter and the ordinance to recycle.
- (2) The persons annually provide written documentation to the municipality of the amount of municipal waste generated as well as the type and weight of materials that were recycled in the previous calendar year.

Act 140 of 2006

Municipalities, except for counties, receiving more than \$10,000 in Act 101 Section 904 Recycling Performance Grant funding must meet the following requirements:

- Requires, through ordinance, that all residents have waste and recycling service.
- Has an implemented residential recycling program and facilitates a commercial recycling program or participates in a similar county or multi-municipal program.
- Has a residential and business recycling education program.
- Has a program of enforcement that periodically monitors participation, receives complaints and issues warnings for required participants and provides fines, penalties, or both, in its recycling ordinance.

- Has provisions, participates in a county or multi-municipal program or facilitates a private sector program for the recycling of special materials.
- Sponsors a program, facilitates a program or supports an organization to address illegal dumping and/or littering problems.
- Has a person or entity designated as recycling coordinator who is responsible for recycling data collection and reporting recycling program performance in the municipality or municipalities.

If the municipality has not met the above performance requirements, the grant funds awarded shall be expended by the municipality only to meet the performance requirements. If the municipality has met the performance requirements, the grant funds awarded may be expended by the municipality on any expense as determined in the discretion of the municipality. The Department may require budget documents or other expenditure records and may deny funding through this Section if an applicant cannot demonstrate that funds have been expended on eligible activities.

CHARLESTOWN TOWNSHIP

4030 Whitehorse Road, P. O. Box 507, Devault, PA 19432

Phone: 610-240-0326 Fax: 610-240-0328 Email: admin1@charlestown.pa.us

**APPLICATION FOR OCCUPANCY CERTIFICATE
NON-RESIDENTIAL BUILDINGS ONLY**

Rev 08/30/12

APPLICATION FEE: \$500.00

Name of Applicant: _____ Phone #: _____

Address of Applicant: _____

Name of Owner: _____

Address of Owner: _____

Application is hereby made for a permit to use (describe building or parcel and **state # of occupants and if it is newly constructed or an existing building**):

Non-residential Building address: _____

Intended Use: _____

Improvements to be made (if any): _____

Zoning District: _____

Waste and Recycling Requirements: All non-residential establishments are required to recycle in accordance with Act 101 of 1988 and Township Recycling Ordinance 2009-153. Please indicate the hauler you have or will contract with for waste and recycling service.

The Township reserves the right to request proof of waste and recycling service at any time.

Signature of Applicant: _____

Application Date: _____ Approximate Settlement Date: _____

DO NOT WRITE BELOW THIS LINE – TO BE COMPLETED BY TOWNSHIP ENGINEER

Approved: _____ Date: _____ Date: _____
Zoning Officer Building Official

Reason for Refusal: _____

Township Engineer Signature: _____

Rejected by:



**Charlestown Township Application for Registration
to Collect, Transport and/or Dispose of
Municipal Waste and Recyclables**

All haulers operating with Charlestown Township are required to manage wastes and recyclables in accordance with Act 101 of 1988 and Township Ordinance #153-2009.

This form must be completed and returned to the Township no later than _____

Company Name _____

Contact Person _____

Company Address _____

Phone _____ 24-Hour Emergency Phone _____

E-Mail _____ Fax _____

Business Hours to Receive Calls, Visits or Correspondence from persons in the Township who receive collection services _____

Number of Charlestown properties regularly serviced in the past 12 months _____

HAULING DETAILS:

Collection Day in Charlestown Township:		
Type of Solid Waste Being Hauled:	Residential	Commercial
Type of Recyclables Being Hauled:	Residential	Commercial
Processor/Marketing Facility for Non-Recyclable Materials: (provide name of facility and location)		
Processor/Marketing Facility for Recyclable Materials: (provide name of facility and location)		
Processor/Marketing Facility for Leaf Waste Materials: (provide name of facility and location)		

COLLECTION EQUIPMENT INFORMATION: Gannett does not believe that equipment info is necessary for the Twp to request. This section could be deleted.

(Attach additional sheets if necessary. This sheet may be photocopied.)

YEAR	MAKE OF TRUCK	MODEL	LICENSE NO.

LEAF WASTE

Separated “leaf waste” is required to be collected at minimum, once in the spring and once in the fall and taken for recycling in accordance with Act 101 of 1988 and Township Recycling Ordinance # 153-2009 to an approved processor. Leaf waste includes leaves from trees, bushes, and all other plants, garden residues, shrubbery, tree trimmings and similar material. Grass clippings are not included in this definition. Provide your collection schedule below:

COLLECTION SCHEDULE FOR 2012:

Spring Collection Date(s)				
Fall Collection Date(s)				

How do you notify customers of this collection schedule? _____

Please email an electronic example(s) of your spring and fall leaf collection notification to admin1@charlestown.pa.us within two weeks of distribution to customers.

Do you collect Christmas Trees? _____

Acknowledgements:

- I/we have received a copy of ordinance # 153-2009 and am/are fully aware of the requirements to collect municipal waste and recyclable materials in Charlestown Township.
- I acknowledge that permitted operations are between 7:00 a.m. and 7:00 p.m. on weekdays and Saturdays in accordance with the Charlestown Township Zoning Ordinance, Section 1616, Noise Control.

Name of Person Submitting Application _____

Signature: _____ Title: _____ Date: _____

ATTACH THE FOLLOWING TO THIS FORM AND RETURN TO CHARLESTOWN TOWNSHIP BY _____ :

A Certificate of Insurance coverage for third party public liability for both bodily injury and property damage, owner's and collector's protective insurance and automobile insurance.

A Certificate of Hauler's Workers Compensation Insurance.

Certificate Letter that you are permitted by Chester County to collect solid waste and recyclables.

Recycling Report providing a breakdown of materials collected for recycling in Charlestown Township during the 2012 calendar year.

This report must include both residential and commercial figures. Quantities of leaf waste recycled as well as other recyclable materials must be included. This report must be signed and certified by the responsible party with your company.

Example(s) of customer leaf waste schedule notification.

Most recent customer list indicating all residential households used. This information will be kept confidential, only to be used by the Township to verify residential participation in waste and recycling service.

Return Form to: Charlestown Township, P.O. Box 507, Devault, PA 19432 no later than _____.

Thank you for your service to our residents and business owners.



GANNETT FLEMING, INC.
P.O. Box 67100
Harrisburg, PA 17106-7100

Location:
207 Senate Avenue
Camp Hill, PA 17011

Office: (717) 763-7211
Fax: (717) 763-8150
www.gannettfleming.com

DRAFT TEMPLATE LETTER TO HAULERS

August __, 2012

ATTN: Hauler Contact
(Hauling Company)
(Address)

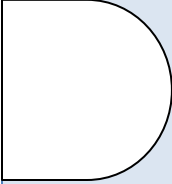
RE: Charlestown Township, Chester County
Act 101 of 1988 - CURBIDE RECYCLING MANDATE NOTICE

Dear Hauler:

Charlestown Township, Chester County has been notified by the Pennsylvania Department of Environmental Protection (PADEP) that due to the Township's year 2010 population density, we are mandated to provide curbside recycling in a manner that complies with the Municipal Waste Planning, Recycling, and Waste Reduction Act (Act 101 of 1988). Charlestown Township hopes to establish a cooperative relationship with each private hauler and work together to meet the State recycling laws. Based on a review of our existing program and notification from PADEP, the key areas we need to cooperate on to achieve compliance include:

- **Leaf waste collection:** haulers must collect source separated "leaf waste" (as defined by Act 101 of 1988) at least once in the spring and once in the fall for delivery to an approved organics processing facility where material is composted, not disposed as waste. Haulers must notify their customers well in advance of the leaf waste collection schedule and provide the notification/schedule to the Township to be recorded, and submitted as proof of compliance upon request to PADEP. At this time, documentable spring and fall leaf waste collections satisfies PADEP. If this approach is not effective, the Township may revise its Recycling Ordinance to require haulers to meet leaf waste collection requirements, possibly including additional leaf waste collections days.
- **Recycling Education:** The Township issues newsletters and posts recycling information on its website. To assure the Township complies with recycling education, it is requesting that each hauler provide an electronic version of the educational info (e.g. recycling procedures) distributed to customers. This should be provided once per year at the same time the info is distributed to customers and when changes are made to the waste and recycling program or procedures that impact your customers.

- **Recycling Participation & Enforcement:** As a small municipality with limited staff resources, the Township will allocate resources occasionally to assess/inspect curbside recycling. PADEP requires that a program is in place to periodically notify non-complying residents. We can meet PADEP enforcement requirements by working together to periodically educate and provide feedback to customers at the curbside. If you already have a method that encourages residential participation similar to what is described below, please provide me with examples (electronic files preferred). Suitable notifications might include a tag, hanger or sticker left on containers at the time of collection that has check boxes to tell customers when they are not following proper procedures. It may be possible that the Township could develop and print these for truck drivers to have in their vehicles and utilize periodically for households where repetitive recycling problems occur. Example:

RECYCLING NOTICE	
Charlestown Township and its residents are required to conduct curbside recycling according to Act 101 of 1988 and the PA Dept. of Environmental Protection.	
	<ul style="list-style-type: none">€ Recyclables found in trash€ Non-recyclable materials found in recyclables€ Container overfilled€ Improper material handling€ Other _____
Explanation:	
Please refer to hauler website or Township website for information on proper recycling methods. Thank you for recycling!	

Thank you for your cooperative assistance to assure Charlestown Township transitions successfully to a mandated recycling community. **Please let us know if you are willing to attend a brief meeting to discuss how to best meet our new recycling requirements?** If you have any questions, contact Linda Csete (admin1@charlestown.pa.us), Charlestown Township Manager at 610-240-0326.

Sincerely,