



pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION



Bureau of Waste Management Non-Regulatory Update

**Solid Waste Advisory Committee
September 16, 2022**

Tom Wolf, Governor

Ramez Ziadeh, Acting Secretary

Background

- Derek Bartram
- Solid Waste Program Specialist (11/22/2021)
- BWM Program Development and Technical Support section (PDTS)
- Technical Guidance Coordinator
- Web Coordinator

BWM TGDs

- BWM currently has ≥ 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 ~ 32 TGDs

Review Process

- 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

TGDs in Development

Number	Title	Date	Pages	FY/Q
250-3120-320	Execution of Release Forms	10/25/1990	2	2022/4th
250-4000-001	Citing Inspection Violations	09/17/2005	2	2022/4th
250-4000-003	Violations Requiring an Extended Period of Time to Correct	09/17/2005	4	2022/4th
250-4110-001	Notices of Violations	09/17/2005	3	2022/4th
250-4180-302	Calculation of Civil Penalties	12/20/1989	8	2022/4th
250-4000-002	Enforcement Actions	09/17/2005	8	2023/1st
250-4000-004	Program Implementation Guidance	09/17/2005	5	2023/1st
254-3120-001	Performing Municipal and Residual Waste Facility Inspections	09/17/2005	7	2023/1st
258-2000-764	Residual Waste and Special Handling Waste Streams	02/12/2005	5	2023/1st
254-5900-001	Guidance for Development and Implementation of Preparedness, Prevention, and Contingency Plans for Waste Oil Burners	10/31/2002	14	2023/1st

Execution of Release Forms (250-3120-320)

- 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 \(250-3120-320\)](#)

Citing Inspection Violations (250-4000-001)

- Purpose: To establish a uniform methodology across all DEP regions for citing violations within municipal, residual and hazardous waste programs.
- [Citing Inspection Violations \(250-4000-001\)](#)

Violations Requiring an Extended Period of Time to Correct (250-4000-003)

- 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 \(250-4110-001\)](#)

▶ Calculation of Civil Penalties (250-4180-302)

- 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 \(250-4180-302\)](#)



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Questions?

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