

# **SOURCE REDUCTION STRATEGY MANUAL**



**COMMONWEALTH OF PENNSYLVANIA**  
**DEPARTMENT OF ENVIRONMENTAL PROTECTION**  
**BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT**

**<http://www.dep.state.pa.us>**

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**Commonwealth of Pennsylvania**  
**Tom Ridge, Governor**

**Department of Environmental Protection**  
**James M. Seif, Secretary**

**An Equal Opportunity Employer**

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## **Introduction**

The Department of Environmental Protection designed this manual to help generators of residual and hazardous waste develop a source reduction strategy. State regulations require generators of residual (§287.53) and hazardous (§262.80) waste to prepare and implement a source reduction strategy (SRS). A copy of the applicable regulations can be found in Appendix A. Generally, the SRS must include:

1. A description of the source reduction achieved during the past five years, including a quantification of the results. This is intended to provide recognition for past achievements and provide a background for the activities planned for the future.
2. A statement that a source reduction program has been established. This may include a statement of corporate source reduction goals or of top management's commitment to implementing the program.
3. A description of what will be done to reduce waste, when the action will be done, and what amount of reduction is anticipated. This is intended to be a simple and direct representation of the results of the assessments made within the facility and the decisions reached regarding source reduction actions that will be taken.

If no source reduction action is proposed, the facility is required to submit detailed justification. This must demonstrate that a thorough internal investigation of source reduction opportunities has been completed. This information must include an extensive waste stream characterization, potential source reduction options considered, how each option was evaluated, and why each option was not selected. Sufficient detail must be provided to demonstrate the technical or economic barriers that prohibit reductions. The level of detail required to justify not participating in source reduction is substantially greater than preparing and implementing a source reduction plan.

## **Questions and Answers**

*Who must prepare the source reduction strategy?*

The state residual waste regulations require that anyone who generated more than 2,200 pounds of residual waste in any calendar month must prepare a source reduction strategy. The department has waived the SRS requirements for individual types of waste that are generated in quantities of less than 2,200 pounds per month per generating locations (See §287.51). The department reserves the right to eliminate this waiver in the future.

The hazardous waste regulations exempt those who generate less than 1,000 kilograms (2,200!pounds) of hazardous waste in each month of the year (See §262.80(e)). There is no waiver for small, individual waste streams.

*When must the strategy be submitted to the department?*

The SRS must be available for inspection at any time and must be submitted to the department upon request. The SRS must be submitted to the appropriate DEP regional office with any Form U (request to process or dispose of an industrial waste at a permitted facility), Form S (request to process or dispose of municipal-like residual waste at a permitted site), or Module 1 (request to process or dispose of hazardous waste). The SRS must also be submitted with any application for a permit to treat, process, or dispose of either residual or hazardous waste.

*How often must the strategy be updated?*

The SRS must be updated every five years unless an alternate schedule is established in writing by the department. The SRS must also be updated any time there is a significant change in the type of waste generated or in the manufacturing process. The update should include the progress achieved during the past five years as well as plans for the next five years.

*Who can I contact if I have questions filling out Form 25R or desire additional information about source reduction for my industry?*

Each regional office has two contact people:

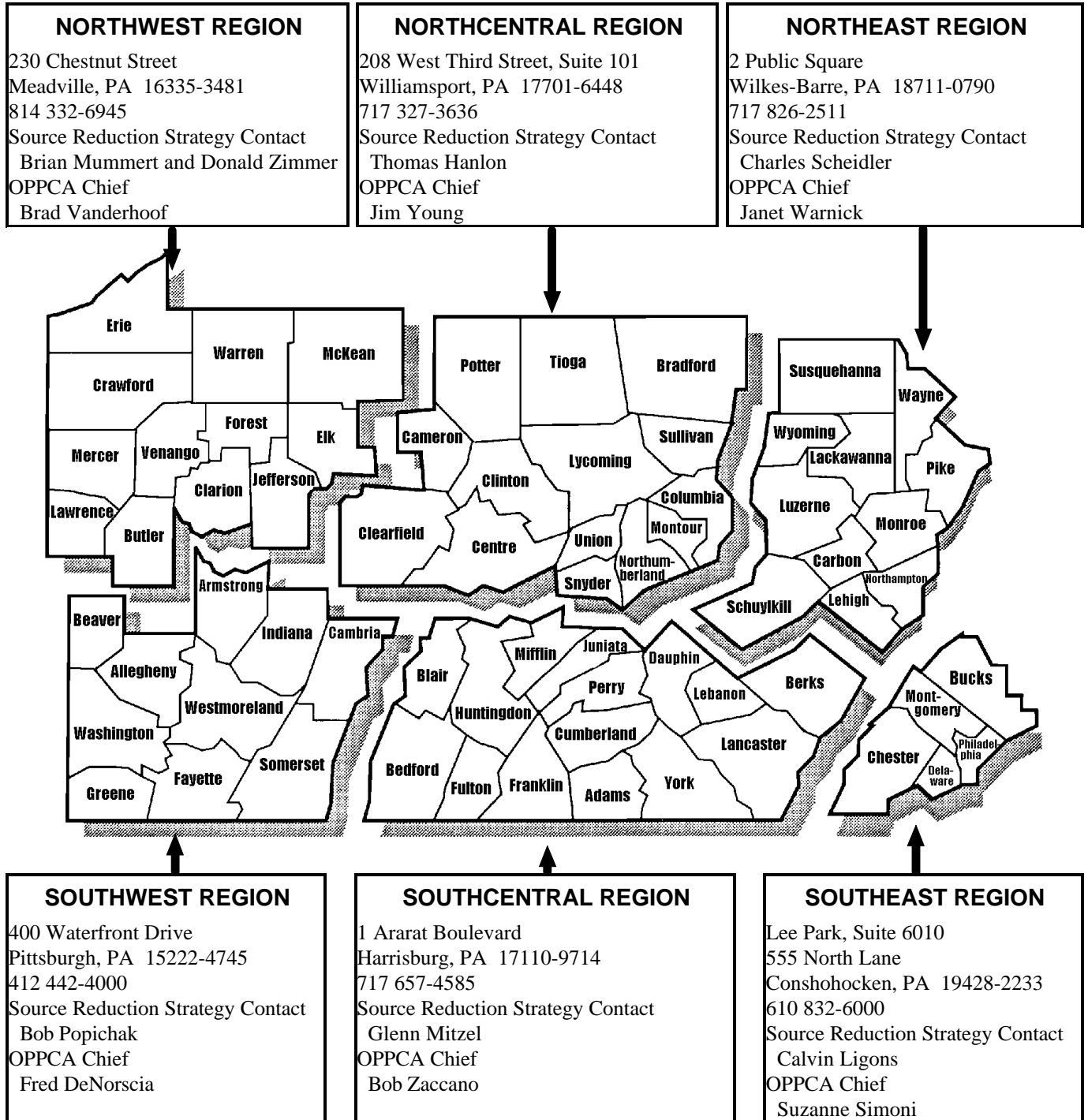
1. For questions on filling out Form 25R, call your regional *Source Reduction Strategy contact person*.
2. For source reduction and pollution prevention technical assistance, call your Regional Chief of the Office of Pollution Prevention and Compliance Assistance (OPPCA).

OPPCA has available to firms a clearinghouse of case studies and technical information for developing and implementing source reduction strategies. Regional Office Chiefs can arrange for a pollution prevention/energy efficiency (P2/E2) site visit at your facility. A P2/E2 site visit is a free, nonregulatory visit to help identify potential cost saving source reduction strategies for your waste streams. Also, Appendix B of this document provides additional sources of pollution prevention information.

A list of names and phone numbers for reaching your Source Reduction Strategy contact person or your OPPCA Regional Chief is provided in Table #1.

# Table #1

## Regional Source Reduction and Strategy Contacts and OPPCA Regional Chiefs



*Are regular progress reports required?*

Progress in achieving source reduction will be described as part of the biennial report for residual waste generators. Additionally, the SRS itself includes a description of past achievements.

*Is an SRS required for each waste stream?*

Generally, a separate SRS is needed for each waste stream. In some cases, it is acceptable to combine several related waste streams which are generated through the same process where the source reduction actions are the same. For example, one SRS could include plating sludge, spent plating bath solutions, and plating rinse water because they come from the same industrial process line and can be reduced by common means. Another example is in the generation of waste laboratory reagents removed via lab packs. Although there may be 200 different waste reagents, they can all be reduced through common means such as inventory control and a reagent exchange program. Therefore one SRS may be adequate for all 200 waste streams.

*I have form 25R for preparing the residual waste SRS, but what form should I use for the hazardous waste SRS?*

Form 25R should also be used for the hazardous waste SRS. Be sure to indicate whether the waste is hazardous or residual by checking the appropriate box in Item 1 on the first page (waste stream name and description).

*Are research and development facilities exempt from the SRS requirement?*

Under residual waste regulations, the department may waive requirements for the SRS at R&D facilities. This would be done on a case-by-case basis if the facility can demonstrate why the SRS does not make sense. There may be many opportunities for SRS at these facilities. There is no such waiver available for hazardous waste generated at R&D facilities.