



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

INSTRUCTIONS FOR SOURCE REDUCTION STRATEGY FORM 25R

GENERAL INFORMATION

The Pennsylvania Department of Environmental Protection (DEP) regulations require generators of residual (25 Pa Code §287.53) and hazardous (25 Pa Code §262a.100) waste to prepare and implement a Source Reduction Strategy (SRS). Generally, the SRS must include the following:

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.

Who must prepare the Source Reduction Strategy (SRS)?

The residual waste regulations require that anyone who generates an average of more than 2,200 pounds (1000 kg) of residual waste per generating location per month based on generation in the previous year must prepare a SRS (25 Pa Code §287.51(a)).

The hazardous waste regulations require those who generate more than 1000 kg (2,200 lbs) of hazardous waste in any month of the year to prepare a SRS (25 Pa Code §262a.100(e)).

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) 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 upon request of the facility.

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.

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 that 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 (25 Pa Code §287.53(f)). This would be done on a case-by-case basis if the facility can demonstrate why the SRS does not make sense. However, there may be many opportunities for SRS at these facilities. There is no such waiver available for hazardous waste generated at R&D facilities.

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.

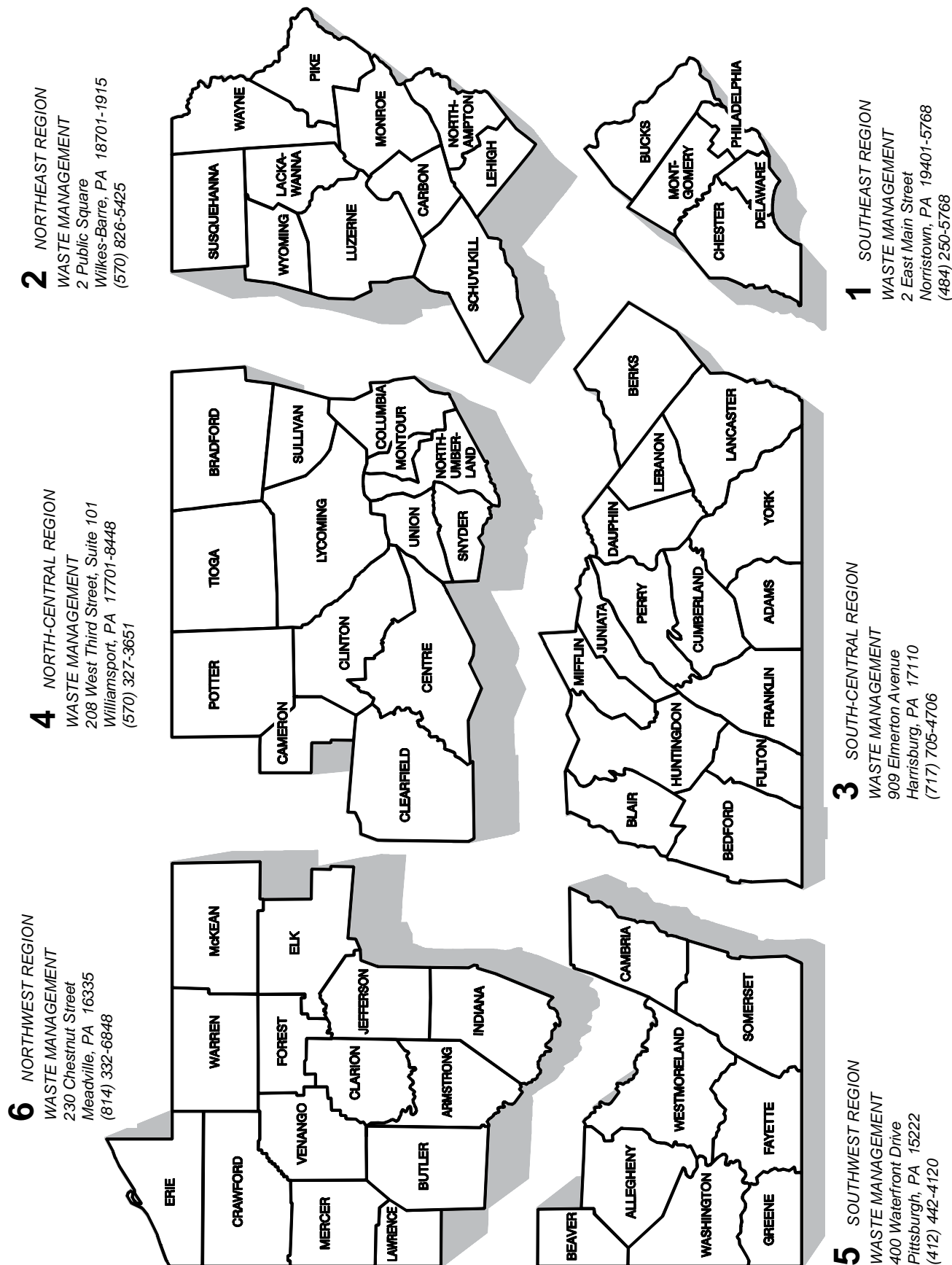
Who can I contact if I have questions filling out Form 25R or desire additional information about source reduction for my industry?

A list of phone numbers for reaching your SRS contacts is provided in Figure 1.

For questions on filling out Form 25R, call your regional SRS contact.

For source reduction technical assistance, call your Regional SRS contact or the Central Office, Hazardous Waste Minimization Program or visit <http://www.depweb.state.pa.us/landrecwaste/cwp/view.asp?A=1242&Q=462262>.

FIGURE 1
Source Reduction and Strategy Contacts
Central Office Contacts



REGULATIONS

The following regulations govern reporting requirements for the SRS program. The information is to be reported on Form 25R.

**TITLE 25. ENVIRONMENTAL PROTECTION
DEPARTMENT OF ENVIRONMENTAL PROTECTION
Chapter 260a to 270a
HAZARDOUS WASTE**

§260a.1 Definitions.

A term defined in this section replaces the definition of the term in 40 CFR 260.10, or, in situations for which no term exists in 40 CFR 260.10, the term shall be defined in accordance with this section. The substitution of terms in §260a.3 (relating to terminology and citations related to Federal regulations) does not apply to the incorporated definition of "EPA region," "State," "United States," "Administrator" and "Regional Administrator."

Source reduction--The reduction or elimination of the quantity or toxicity of hazardous waste generated. Source reduction may be achieved through changes within the production process, including process modifications, feedstock substitutions, improvements in feedstock purity, shipping and packing modifications, housekeeping and management practices, increases in the efficiency of machinery, and recycling within a process. The term does not include dewatering, compaction, reclamation, treatment, or the use or reuse of waste.

§262a.100 Source Reduction Strategy.

(a) By January 17, 1994, a person or municipality that generates hazardous waste shall prepare a source reduction strategy in accordance with this section. Except as otherwise provided in this article, the strategy shall be signed by the person or municipality that generated the waste, be maintained on the premises where the waste is generated, be available on the premises for inspection by any representative of the Department and be submitted to the Department upon request. The strategy may designate certain production processes as confidential. This confidential information may not be made public without the expressed written consent of the generator. Unauthorized disclosure is subject to appropriate penalties as provided by law.

(b) For each type of waste generated, the strategy shall include:

- (1) A description of the source reduction activities conducted by the person or municipality in the 5 years prior to the date that the strategy is required to be prepared. The description shall quantify reductions in the weight or toxicity of waste generated on the premises.
- (2) A statement of whether the person or municipality has established a source reduction program. This program shall identify the methods and procedures that the person or municipality will implement to achieve a reduction in the weight or toxicity of waste generated on the premises, quantify the projected reduction in weight or toxicity of waste to be achieved by each method or procedure and specify when each method or procedure will be implemented.
- (3) If the person or municipality has not established a source reduction program as described in paragraph (2), it shall develop a strategy including the following:
 - (i) A waste stream characterization, including source, hazards, chemical analyses, properties, generation rate, management techniques and management costs.
 - (ii) A description of potential source reduction options.
 - (iii) A description of how the options were evaluated.
 - (iv) An explanation of why each option was not selected.

- (c) The strategy required by this section shall be updated when either of the following occurs:
- (1) There is a significant change in a type of waste generated on the premises or in the manufacturing process, other than a change described in the strategy as a source reduction method.
 - (2) Every 5 years, unless the Department establishes, in writing, a different period for the person or municipality that generated the waste.
- (d) If hazardous waste generated by a person or municipality will be treated, stored or disposed of at a solid waste management facility which has applied to the Department for approval to treat, store or dispose of the waste, the person or municipality that generated the hazardous waste shall submit the source reduction strategy required by this section to the facility upon the request of the facility.
- (e) This section does not apply to persons or municipalities that generate a total of less than 1,000 kilograms of hazardous waste in each month of the year.
- (f) A person or municipality that generates hazardous waste may reference existing documents it has prepared to meet other waste minimization requirements to comply with this section, including those proposed to comply with 40 CFR 261.41(a)(5)--(7) (relating to biennial report).

**TITLE 25. ENVIRONMENTAL PROTECTION
DEPARTMENT OF ENVIRONMENTAL PROTECTION
Chapter 287-299
RESIDUAL WASTE**

§287.1 Definitions.

The following words and terms, when used in this article, have the following meaning, unless the context clearly indicates otherwise:

Source reduction--The reduction or elimination of the quantity or toxicity of residual waste generated which may be achieved through changes within the production process, including process modifications, feedstock substitutions, improvements in feedstock purity, shipping and packing modifications, housekeeping and management practices, increases in the efficiency of machinery, and recycling within a process. The term does not include dewatering, compaction, waste reclamation, or the use or reuse of waste.

§287.51 Scope.

(a) A person or municipality that generates more than an average of 2,200 pounds of residual waste per generating location per month based on generation in the previous year shall comply with the biennial report and source reduction strategy requirements under § § 287.52 and 287.53 (relating to biennial report; and source reduction strategy).

§287.52 Biennial Report.

(b)(6) A description of the generator's efforts to implement its source reduction strategy under §287.53 (relating to source reduction strategy) and, to the extent the information is available for years before 1991, a description of changes in the weight or toxicity of waste achieved during the year compared to previous years.

§287.53 Source Reduction Strategy.

(a) A person or municipality subject to this chapter shall prepare a source reduction strategy in accordance with this section. Except as otherwise provided in this article, the strategy shall be maintained on the premise where the waste is generated, shall be available on the premises for inspection by a representative of the Department and be submitted to the Department upon request.

(b) For each type of waste generated, the strategy shall include:

- (1) A description of the source reduction activities conducted by the person or municipality in the 5 years prior to the date that the strategy is required to be prepared. The description shall quantify reductions in the weight or toxicity of waste generated on the premises.
- (2) A statement of whether the person or municipality has established a source reduction program.
- (3) If the person or municipality has not established a source reduction program as described in paragraph (2), the strategy shall identify the methods and procedures that the person or municipality will implement to achieve a reduction in the weight or toxicity of waste generated on the premises, quantify the projected reduction in weight or toxicity of waste to be achieved by each method or procedure and specify when each method or procedure will be implemented.
- (4) If the person or municipality has not established a source reduction program as described in paragraph (2), the strategy shall include the following:
 - (i) A waste stream characterization, including source, hazards, chemical analyses, properties, generation rate, management techniques and management costs.
 - (ii) A description of potential source reduction options.

- (iii) A description of how the options were evaluated.
 - (iv) An explanation of why each option was not selected.
- (c) The strategy required by this section shall be updated when either of the following occurs:
 - (1) There is a significant change in a type of waste generated on the premises or in the manufacturing process, other than a change described in the strategy as a source reduction method.
 - (2) Every 5 years, unless the Department establishes, in writing, a different period for the person or municipality that generated the waste.
- (d) If residual waste generated by a person or municipality will be processed or disposed of at a solid waste management facility which has applied to the Department for approval to process or dispose of the waste, the person or municipality that generated the residual waste shall submit the source reduction strategy required by this section to the facility upon the request of the facility. If residual waste generated by a person or municipality is processed or disposed of at a solid waste management facility which has received written approval from the Department to process or dispose of the waste, the person or municipality shall submit the source reduction strategy required by this section to the facility whenever the Department requires the person or municipality to update the strategy.
- (e) The strategy shall be signed by a responsible official for the facility that generated the waste.
- (f) The Department may in writing waive or modify the requirements of this section for research and development activities.

§287.133 Source Reduction Strategy.

An application for the processing or disposal of residual waste shall contain a copy of the source reduction strategy required by §287.53 (relating to source reduction strategy) for each residual waste to be received at the facility.

**TITLE 25. ENVIRONMENTAL PROTECTION
DEPARTMENT OF ENVIRONMENTAL PROTECTION
Chapter 271-285
MUNICIPAL WASTE**

§271.1 Definitions.

The following words and terms, when used in this article, have the following meaning, unless the context clearly indicates otherwise:

Source reduction--The reduction or elimination of the quantity or toxicity of residual waste generated which may be achieved through changes within the production process, including process modifications, feedstock substitutions, improvements in feedstock purity, shipping and packing modifications, housekeeping and management practices, increases in the efficiency of machinery, and recycling within a process. The term does not include dewatering, compaction, waste reclamation, or the use or reuse of waste.

§271.612 Source Reduction Strategy.

An application for the processing or disposal of residual waste shall contain a copy of the source reduction strategy required by §287.53 (relating to source reduction strategy) for each residual waste to be received at the facility.