

# Renewed NJDEP Focus on Recycling

Re-adoption and additions to N.J.A.C. 7:26A



## Background

- ❖ “Recycling is the Law” per:
  - 1987 – NJ Statewide Mandatory Source Separation and Recycling Act (N.J.S.A. 13:1E-99.11 et seq);
  - Recycling Enhancement Act (P.L. 2007, Ch. 311);
  - Electronic Waste Recycling Act (P.L. 2008, Ch. 130);
  - Standards for Universal Waste Management (40 C.F.R. 273)
  - Statewide Solid Waste Management Plan;
  - District (County) Solid Waste Management Plans; and
  - Municipal Recycling Ordinances.
- ❖ Municipalities must achieve a 50% Municipal Solid Waste (MSW) recycling rate.





## Municipal Solid Waste

- ❖ What is Municipal Solid Waste (MSW)?
  - Included:
    - 01 Corrugated
    - 02 Mixed Office Paper
    - 03 Newspaper
    - 04 Other Paper/Mag/Junk Mail
    - 05 Glass Containers
    - 06 Aluminum Containers
    - 07 Steel Containers
    - 08 Plastic Containers
    - 12 Anti-freeze
    - 16 Used Motor Oil
    - 17 Brush/Tree Parts
    - 18 Grass Clippings
    - 19 Leaves
    - 21 Consumer Electronics
    - 23 Food Waste
    - 24 Batteries (Dry-cell)
    - 25 Other Glass
    - 26 Other Plastic
    - 29 Textiles
  - The following are identified as Bulky and are not included:
    - 09 Heavy Iron
    - 10 Non-Ferrous/Aluminum Scrap
    - 11 White Goods & Light Iron
    - 13 Batteries (Automobile)
    - 14 Automotive Scrap
    - 15 Tires
    - 20 Stumps
    - 22 Concrete/Asphalt/Brick/Block
    - 24 Other Materials Not Listed
    - 27 Oil Contaminated Soil
    - 28 Process Residue
    - 30 Wood Scraps

*NJDEP Category Number for Recycled Materials for Tonnage Reports*




## Statewide Solid Waste Management Plan

- ❖ State's Recycling Agenda set by the Statewide Solid Waste Management Plan (SWMP);
  - Recently, State chose to focus attention on recycling in *Multi-Family Housing Complexes* and *Businesses*;
- ❖ Updated every 10 years by NJDEP
  - Last State update was 2005
- ❖ All Solid Waste Management Districts (21 Counties and the Meadowlands) are required to update their SWMPs to be compliant with the State's focus.





## County Compliance with Statewide SWMP

- ❖ Districts must designate at least three materials (in addition to leaves) for recycling;
- ❖ Districts must describe how they anticipate to reach the State-mandated 50% recycling rate of MSW;
- ❖ Municipalities have 6 months to update ordinances for compliance with their District SWMP;
- ❖ Districts must keep updated ordinances on file.



## Recycling Regulations Updated, 2009

- ❖ Regulations at N.J.A.C. 7:26A re-adopted with additional chapters (Effective February 2, 2009):
  - SUBCHAPTER 9. CIVIL ADMINISTRATIVE PENALTIES AND REQUESTS FOR ADJUDICATORY HEARINGS
  - SUBCHAPTER 10. STANDARDS FOR GENERATORS OF SOURCE SEPARATED RECYCLABLE MATERIALS
  - SUBCHAPTER 11. STANDARDS FOR MUNICIPALITIES
  - SUBCHAPTER 12. STANDARDS FOR COUNTIES





## N.J.A.C. 7:26A-9

### ❖ CIVIL ADMINISTRATIVE PENALTIES AND REQUESTS FOR ADJUDICATORY HEARINGS

- (a) The Department may assess a civil administrative penalty pursuant to this section of not more than \$ 50,000 for each violation of each requirement of any rule listed in *N.J.A.C. 7:26A-9.4(g)*.
- (b) Each violation of a rule listed in *N.J.A.C. 7:26A-9.4(g)* shall constitute an additional, separate and distinct violation.
- (c) Each day during which a violation continues shall constitute an additional, separate and distinct violation.
- Penalties for Minor Violations start at \$3,000.



## N.J.A.C. 7:26A-10

### ❖ STANDARDS FOR GENERATORS OF SOURCE SEPARATED RECYCLABLE MATERIALS

- Generators include all persons occupying residential, commercial, or institutional premises;
- NJAC 7:26A-10.2: "...all materials designated for source separation in the municipal recycling ordinance [shall be] stored separately from solid waste..."
- NJAC 7:26A-10.3: "Commercial and institutional generators including multifamily housing owners or their agents shall report the tonnage of designated recyclable materials collected for recycling from their premises, as directed in the municipal recycling ordinance."
- 7:26A-10.4: Source separation exemption. Only available to Commercial and Institutional generators.

\*N.J.A.C. 7:26A-4.4(a) – **Tonnage Reporting Requirements:** "All operators of recycling centers shall provide a recycling tonnage report by March 1 of each year to the county of origin (if requested) and all municipalities from which recyclable material is received in the previous calendar year."





## N.J.A.C. 7:26A-11

### ❖ STANDARDS FOR MUNICIPALITIES

- Codifies many statutory requirements originally listed in the 1987 Recycling Act and the new requirements under the Recycling Enhancement Act;
  - NJAC 7:26A-11.1(a) – Municipalities must designate a Recycling Coordinator who, among other duties, must:
    - Maintain and report recycling tonnage annually (ie. Tonnage Grants);
    - Be able to communicate via E-mail to the County and State;
    - **Hold a Certified Recycling Professional certification by January 28, 2010** (Legislative Bill to extend deadline to 2012)
- NJAC 7:26A-11.1(b) – Municipalities must adopt a recycling ordinance:
  - Materials designated in the District SWMP must be designated in the ordinance;
  - The municipal official(s) who will enforce the ordinance shall be specified by title.



## Certified Recycling Professional

NJ Recycling Certification Series	Full 21-Day Series (9 Courses over ~ 1.5 years)	Alternative Four-day Program & Exam	Submit Application for Certification/Recertification
Persons With No Formal Training and no Title	Y		Y
Persons Holding a Title (Clerk, Health Officer, Township Manager, Purchasing Agent, Township Engineer, Recycling Coordinator, District Recycling Coordinator and related statutory positions – government employees only) With <u>less than Ten (10) years experience</u>	Y		Y
Certified Public Works Managers With <u>less than Ten (10) years experience</u>	Y - with exemptions for overlapping courses		Y
Persons Holding a Title With Ten (10) years experience		Y	Y
Certified Public Works Managers With Ten (10) years experience		Y	Y
Persons Seeking CRP Recertification (those with lapsed or inactive CRP certification)	Must complete "The Recycling Coordinator's Primer" and nine (9) additional hours of applicable continuing education within one (1) year of application		Y

For more information call 732-932-9271, or visit [www.cpe.rutgers.edu/programs/NJ-recycling-certification.html](http://www.cpe.rutgers.edu/programs/NJ-recycling-certification.html)





## N.J.A.C. 7:26A-11

### ❖ STANDARDS FOR MUNICIPALITIES (continued)

- NJAC 7:26A-11.2 - Recordkeeping and Reporting: Essentially the same as the Tonnage Grant Application. Due annually by April 30.
- NJAC 7:26A-11.3 - Notification to all Generators of Source Separation Requirements. At least once every six months. May include:
  - Advertisement in a newspaper circulating in the municipality;
  - Posting a notice in public places where public notices are customarily posted;
  - Including a notice with other official notifications periodically mailed to taxpayers; or any combination thereof.
- 7:26A-11.4 - Collection of Source Separated Recyclables
  - "The governing body of each municipality shall, at least once every 36 months, review and revise the master plan and development regulations..."



## N.J.A.C. 7:26A-11

### ❖ STANDARDS FOR MUNICIPALITIES (continued)

- NJAC 7:26A-11.5 - Source Separation Exemption: Municipalities may allow Commercial and/or Institutional generators an exemption, provided that:
  - The Recycling Coordinator develops and provides a form on which generators can apply;
  - The Recycling Coordinator reviews the application, written reports from the facility(ies) providing this alternate service and annual reports from the generator;
  - The Recycling Coordinator researches the recycling facility(ies) permitted status;
  - The exemption approval shall be issued in writing;
  - The Recycling Coordinator keeps record of all exempted generators and the destination of the material in question, and submits annually to the County Coordinator.





## N.J.A.C. 7:26A-12

### ❖ STANDARDS FOR COUNTIES

- NJAC 7:26A-12.2 - Planning by the designated agency: The County will become a clearing house of recycling and solid waste information, including:
  - A list of approved solid waste and recycling facilities in the County;
  - Approved truck routes to those facilities;
  - A listing of Used Oil collection points within the County; etc.
- NJAC 7:26A-12.3 - Appointment of a County or a New Jersey Meadowlands District Recycling Coordinator: The County will designate a Recycling Coordinator who will:
  - Maintain copies of all updated municipal recycling ordinances;
  - Maintain a listing of municipal source separation exemptions;
  - Meet at least annually with municipal recycling coordinators.



## Tonnage Reporting to NJDEP

- ❖ Some municipalities “opted-out” of filing Recycling Tonnage Grant Applications in the past:
  - “There’s no money there anymore...” – *FALSE*
  - “It’s not worth my time to file one...” – *FALSE*
  - “My recycling program will never see that money, it’ll go into the general treasury...” – *FALSE*
  - At one time the Recycling Tonnage Grant program was without funds, but there is now a **new infusion of money**;
  - **All funds** received through the Tonnage Grant process must be used to enhance the municipal recycling program.





## The REA and N.J.A.C. 7:26A

### ❖ Recycling Enhancement Act (REA) and the Updated Recycling Regulations:

- Annual tonnage reports from each municipality are now mandatory;
- These reports will double as Tonnage Grant Applications;
- Due annually by April 30 to Joseph Davis (NJDEP);
- Beginning in 2010, reports must be filed electronically;
- \$3/ton tax on Solid Waste tipped in NJ = Renewed Funding for the Tonnage Grant program;



## Municipal Tonnage Grants (TG)

- ❖ 2009 (2008 TG) – General Treasury + REA Tax
- ❖ 2010 (2009 TG) – Grants will be fully funded by REA Taxes
- ❖ More money than ever before available for municipal recycling programs, which will also cover all REA tax paid on solid waste.
- ❖ Pursuant to P.L. 2007, CHAPTER 311 (The Recycling Enhancement Act), "All grant monies received by a municipality shall be expended only for its recycling program," such as:
  - *Recycling containers,*
  - *Maintenance of municipal drop-off center,*
  - *Management of municipal compost site,*
  - *Household hazardous waste and e-waste events,*
  - *Salary and costs related directly to education and outreach of municipal recycling program, or*
  - *Enforcement of local recycling ordinance.*
  - NOT police vehicles made from recycled steel.







## Maximizing Tonnage = Maximizing Grants

- ❖ Unfortunately, Municipalities must track recycling tonnage going in several different directions;
- ❖ NJDEP is pushing Counties and Municipalities to go after Multi-Family housing complexes and Commercial establishments;
- ❖ Historically these have been areas of greatest concern;
  - Many businesses believe recycling is optional;
  - Businesses and building owners/managers have been told, by haulers, they can co-mingle garbage and recyclables.



## Maximizing Tonnage = Maximizing Grants

- ❖ Multi-Family Housing – a great return on investment;
  - Require a great deal of involvement from Recycling Coordinator and Building Owner/Manager;
  - Resident turn-over is high; Constant education necessary;
  - Follow up visits and phone calls may be necessary;
  - Complexes with private hauling are entitled to reimbursement from municipality; hold back money until facility is compliant;
  - However - If these complexes start properly recycling, municipality, or private hauler, should start collecting a highly concentrated tonnage of material in one stop.



 **Explicit Signage = Increased Participation**



<u>All Paper</u>	<u>Bottles &amp; Cans</u>	<u>Trash</u>
Magazines & Catalogs 	Soda cans & Aluminum products 	Styrofoam cups, used paper cups, lids & caps 
All paper & Envelopes 	Plastic bottles & Plastic Jugs 	Paper towels, napkins, plastic wrap & bags 
Paper bags & Paperboard boxes 	Glass bottles 	Take-out food containers, plastic utensils, yogurt containers, & all other non-paper waste 

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 **Outreach = Greater Tonnage**

- ❖ Twice annually, municipalities are obligated to notify all generators of recycling requirements per NJAC 7:26A-11.3;
  - Residential, Commercial and Institutional
- ❖ Regulation does not specify notifications need only be printed;
- ❖ Recycling Coordinators may reach out to:
  - Chambers of Commerce;
  - Schools (K-12) and Higher Education;
  - Citizens Groups, etc.

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## Enforcement = Greater Tonnage

- ❖ Be sure municipal ordinance states Commercial and Institutional generators must report all recycling tonnage to the municipality;
  - Without such a statement, NJAC 7:26A-10.3 becomes more difficult to use as an **enforcement mechanism**;
- ❖ County CEHA able to enforce District SWMP, of which municipal ordinances are an extension;
- ❖ Conduct site visits, "dumpster dive" and rattle garbage bags to identify non-compliant generators;
  - Multiple Dumpsters vs. One Dumpster = Easy Catch



## Universal Waste (Formerly HHW)

### ❖ What is Universal Waste?

- A specific hazardous waste stream that has been designated by EPA, and later by New Jersey, that has alternative management options
- Found in the municipal solid waste stream
- Fails hazardous waste test
- Negatively impacts solid waste facility operations
- Presents low risk in collection, storage and transportation when properly managed.
- IS CONSIDERED CLASS D RECYCLABLE MATERIAL IF BOUND FOR RECYCLING





## Universal Waste (Formerly HHW)

### ❖ What is Universal Waste?

- Antifreeze ID 12
- Batteries (Automotive) ID 13
- Batteries (HH, Rechargeables, Power Tools) ID 24
- Mercury containing devices (thermostats) ID 24
- Pesticides (expired or unwanted) ID 24
- Fluorescent Lamps (tubes and compact bulbs) ID 24
- Consumer Electronics (anything with circuitry)\* ID 23
- Oil-Based Finishes (in original packaging)\* ID 24

#### \* Additional NJ Universal Wastes


- USED OIL IS NOT A UNIVERSAL WASTE
- LATEX PAINT IS NOT A UNIVERSAL WASTE



## Universal Waste Handlers



- ❖ A generator of universal waste(s), or
- ❖ The owner or operator of a facility that receives universal waste(s) from other universal waste handlers, accumulates universal waste(s), or sends universal waste(s) to another universal waste handler, to a destination facility or to a foreign destination.





## Universal Waste Handlers

- ❖ Small Quantity Handlers
  - Accumulate less than 5,000 kg (11,000 lbs) of universal waste at any given time.
  
- ❖ Large Quantity Handlers
  - Accumulates 5,000 kg (11,000 lbs) of universal waste at any given time.

## Universal Waste Handlers

Requirement	SQH	LQH
Proper Labeling	Y	Y
Removed from site within 1 year	Y	Y
Sent to another UW handler or destination facility	Y	Y
Must contain potential releases	Y	Y
Employee training	Y	Y
Recordkeeping; maintain for 3 years	Voluntary	Y
Acquire a USEPA ID #		Y
Notify NJDEP	Voluntary	Y
Annual Facility Report		Y
Annual Recycling Tonnage Report to Recycling Coordinator	Y	Y





## Universal Waste Labels

- ❖ Labels must be clear, legible and easily visible
- ❖ Labels should include the accumulation start date (or an inventory log of the universal waste kept on site may be used)
- ❖ When possible, package with the original label (e.g. pesticides)
- ❖ Free Labels: [www.ecy.wa.gov/programs/hwtr/hw\\_labels](http://www.ecy.wa.gov/programs/hwtr/hw_labels)



## Universal Waste Labels

- ❖ What's wrong here?





## Universal Waste Storage

- ❖ Must be stored away from the elements in separate, structurally sound containers, compatible with its contents, to prevent breakage, and to catch any leakage/spillage



- ❖ Containers may be kept open during the day when accepting material



## Universal Waste

- ❖ For more information:
  - ❖ USEPA: [www.epa.gov/epawaste/hazard/wastetypes/universal/index.htm](http://www.epa.gov/epawaste/hazard/wastetypes/universal/index.htm)
  - ❖ NJDEP: [www.nj.gov/dep/dshw/lrm/uwaste](http://www.nj.gov/dep/dshw/lrm/uwaste)
    - o Inspection Checklists: [www.nj.gov/dep/enforcement/hw-chklists.html](http://www.nj.gov/dep/enforcement/hw-chklists.html)
    - o Inspection Reports: [www.nj.gov/dep/enforcement/hw-chklists.html](http://www.nj.gov/dep/enforcement/hw-chklists.html)
    - o Fact Sheets: [www.nj.gov/dep/dshw/lrm/uwaste/uwindex.htm](http://www.nj.gov/dep/dshw/lrm/uwaste/uwindex.htm)





## Electronic Waste

- ❖ What is E-Waste
  - Discarded computers, laptops, monitors & televisions (CRTs), cell phones, fax machines, gaming consoles, radios, microwaves, etc.
- ❖ What's in E-Waste:
  - Lead, Mercury, Cadmium, Nickel, Zinc, Brominated Flame Retardants
- ❖ What are Covered Electronics
  - desktop or personal computer,
  - computer monitor,
  - portable computer,
  - television,
  - telephone (if it contains a monitor >4", measured diagonally)






## E-Waste Recycling Legislation


- ❖ The "Electronic Waste Recycling Act" signed into law in January 2008
- ❖ January 1, 2010 – TV manufacturers must register with the NJDEP and pay an annual \$5000 fee (*Other covered electronic device (CED) manufactures must register by February 1, 2010*).
- ❖ January 1, 2011 – All registered TV Manufacturers must participate in a non-exclusive State-wide recycling program to collect, transport and recycle used TVs.
- ❖ The department shall ensure that at least one electronics collection opportunity is available in each county ... and in such a manner as to be convenient, to the maximum extent practicable and feasible, to all consumers in the county.
- ❖ January 1, 2011 – Disposal ban of used covered electronic devices
- ❖ [www.nj.gov/dep/dshw/recycle/whatsnew/electronic\\_act\\_signed.htm](http://www.nj.gov/dep/dshw/recycle/whatsnew/electronic_act_signed.htm)






 **Used Oil**

- ❖ Used Oil is not a Waste or a Hazardous Waste
- ❖ Collection
  - District Recycling Coordinators must maintain lists of all used oil collection centers and aggregate points in the County (or NJ Meadowlands District).
  - Used oil may be rejected by aggregate points if there is reasonable suspicion that the oil is contaminated or if more than 2 gallons is delivered.
  - Used oil collectors may charge to defray the cost of the collection and disposal.
  - May transport up to 55 gallons in your trucks.

 **RECYCLE  
USED OIL**


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 **Used Oil**

- ❖ Collection (cont.)
  - Municipal used oil collection centers should be supervised.
  - High-quality used oil is a commodity.
  - Consider Spill Prevention Control & Countermeasures (SPCC) and your Municipal Stormwater Permit



**USED OIL ONLY**  
**WARNING!!!**  
 **DO NOT MIX WITH:  
solvents, gasoline, engine  
degreasers, or antifreeze**

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## Used Oil


- ❖ Secondary Containment
  - Should have a bung or valve and be watertight.
  - Should be covered to prevent precipitation
  - Concrete/Cinderblocks are “sufficiently impervious,” however, not impenetrable.
  - **If your secondary containment contains oil or an oil/water mixture, it is no longer “secondary containment.” It is an AST, and requires secondary containment.**
- ❖ Spill Kit
  - Keep one accessible at all times to all potential spill sites
  - Keep it stocked



## Used Oil

- ❖ Used Oil Heaters (Site Aggregate)
  - Requires registration with NJDEP <500,000 BTU
  - Requires an NJDEP air permit at 500,000 BTU (Half the BTU of traditionally fueled boilers/heaters)
  - Requires monitoring
  - Requires annual combustion adjustments
  - Requires visible emissions checks





# QUESTIONS?



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## Stormwater Permit Renewal

### Changes to Tier A Permit Requirements



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## Stormwater Permit Renewal


- ❖ Effective March 1, 2009
  
- ❖ Annual Reports were due May 2, 2009
  - Electronic Submittal
  
- ❖ Updates to SPPP were required to be completed by June 1, 2009.



## Local Public Education



- ❖ New Points System
  - Must complete activities totaling 10 points annually
  - Completing previous requirements (brochure and annual event) = 5 points
  - NJDEP approved activities listed in Attachment E of Permit






## Local Public Education Activities

- o School Presentations (1 point per visit/max of 5 points per year)
- o Website (1 point)
- o Stormwater Display (2 points)
- o Giveaway (2 points)
- o Citizen Stormwater Advisory Committee (2 points)
- o Utilize Department Materials (advertisements) (2 points each/max 4 points per year)
- o Poster Contest (2 points)
- o Stormwater Training for Elected Municipal Officials (3 points)
- o Mural in Downtown/Commercial Area (3 points)
- o Mailing (3 points)
- o Partnership Agreement/Local Event – 2 watershed stewardship activities (3 points)
- o Ordinance Education – distribute letter from the mayor (5 points)

## Local Public Education – Tip Cards

IF YOU WASH  
YOUR CAR IN THE DRIVEWAY,  
YOU MIGHT AS WELL WASH IT  
IN THE LAKE.




Rain washes pollutants into storm drains which  
flow directly into our streams, lakes,  
rivers and the ocean.  
So what can you do?




www.cleanwaterNJ.org

IF YOU USE TOO MUCH  
FERTILIZER ON YOUR LAWN,  
YOU MIGHT AS WELL  
FERTILIZE THE STREAM.




Rain washes pollutants into storm drains which  
flow directly into our streams, lakes,  
rivers and the ocean.  
So what can you do?




www.cleanwaterNJ.org

IF YOUR CAR LEAKS  
OIL IN THE DRIVEWAY,  
YOU MIGHT AS WELL  
LET IT LEAK IN THE OCEAN.



Rain washes pollutants into storm drains which  
flow directly into our streams, lakes,  
rivers and the ocean.  
So what can you do?



www.cleanwaterNJ.org


IF YOU DON'T  
PICK UP AFTER YOUR PET,  
IT MIGHT AS WELL  
POOP IN THE RIVER.




Rain washes pollutants into storm drains which  
flow directly into our streams, lakes,  
rivers and the ocean.  
So what can you do?




www.cleanwaterNJ.org





## New Stormwater Ordinances


- ❖ Refuse Container/Dumpster Ordinance
  - Adopted by Sept. 1, 2010
  - Requires dumpsters and other refuse containers that are outdoors/exposed to stormwater to be covered at all times
  - Excludes permitted temporary demolition containers, containers at facilities with a NJPDES permit, litter receptacles, individual homeowner trash and containers that hold large bulky items (e.g., furniture, bound carpet and padding) only.



## New Stormwater Ordinances



- ❖ Private Storm Drain Inlet Retrofitting Ordinance
  - Adopted by Sept. 1, 2010
  - Requires retrofitting of existing storm drain inlets to meet the standard in Attachment C of permit during alterations, repaving, repairing and resurfacing on properties not owned/operated by municipality
  - Excludes pothole repairs and individual single family homes.






## New Stormwater Ordinances


- ❖ Fertilizer Management Ordinance (for certain municipalities located in Bergen, Essex, Passaic, Somerset and Union Counties)
  - Adopt by **Sept. 1, 2009**
  - Required for municipalities identified in the adopted Non-Tidal Passaic River Basin Addressing Phosphorous Impairments TMDL.
  - Model ordinance provided by the Division of Watershed Management.

## Catch Basin Inspection/Cleaning



- ❖ Schedule included in permit renewal
  - Less than 5,000 basins
    - Must inspect at least 1,000 annually
  - 5,000 or more basins
    - Must inspect all by Feb. 28, 2014
  - Documentation of the amount of material collected must be kept separate from street sweeping totals.






## Other Changes...

- ❖ **Yard Waste Ordinance**
  - Prohibit placing yard waste at curb more than 7 days prior to a scheduled pickup – REMOVED FROM PERMIT
- ❖ **Road Erosion Control Program**
  - Requirement removed from permit. May choose to continue as an optional measure.
- ❖ **Inlet Retrofitting**
  - Expanded the definition of resurfacing to include “top coating or chip sealing with asphalt emulsion...”





## Continuing Requirements

- ❖ **Outfall Mapping/Illicit Connection Inspections**
  - All mapping and initial inspections was required to be completed by April 1, 2009.
- ❖ **Street Sweeping**
  - Monthly sweeping for required streets
  - Reporting to include miles swept and amount of materials collected
- ❖ **Stormwater Facility Maintenance**
  - Annual inspections of detention/retention basins, swales, etc.











## Continuing Requirements

- ❖ **Equipment and Vehicle Washing**
  - Cannot discharge equipment or vehicle washwaters to surface water or groundwater as of Feb. 28, 2009.
  - Must maintain record of where and when equipment and vehicle washing occurs to document proper management of washwater discharge.
- ❖ **Employee Training**
  - Annual training must be provided to all municipal employees on applicable topics.



# QUESTIONS?



<b><u>Recycling Rules</u></b>	<b><u>Stormwater Rules</u></b>
Rich Erickson	Kristi Butkowski
Jared Eudell	Chris Gulics
Rob Teeter	

PMK Group  
Birdsall Services Group  
**1-800-879-6681**

