



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF WASTE MANAGEMENT

## FORM 25R SOURCE REDUCTION STRATEGY

**For Information contact 717-787-7381 (Residual Waste) or 717-787-6239 (Hazardous Waste). Related environmental information is available electronically via Internet. Access the DEP Web Site at <http://www.dep.state.pa.us> (choose: Information by Subject/Online Documents Warehouse/Permits and Authorization Packages/ Waste Management/Municipal and Residual Waste or Hazardous Waste)**

This form provides guidance on the content and format of the written source reduction strategy (SRS). Supplemental guidance on the comprehensive process of analyzing the processes by which waste is generated and developing and evaluating source reduction options is available from the Department in a separate document, the "Source Reduction Strategy Manual." The written SRS is intended to summarize the results of a comprehensive internal process of source reduction assessments and decisions. Generally, a separate SRS should be prepared for each type of waste stream generated. The strategy may be prepared on this form or prepared on separate paper using this format.

Source reduction is the reduction or elimination of the quantity or toxicity of residual waste before it is 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. Please note that source reduction does not include dewatering, compaction, waste reclamation, or the use or reuse of waste. These activities, although they can result in environmental benefit, are of lower priority in the waste management hierarchy and should not be included in the SRS. These processing, use, and reclamation activities are encouraged through the permit-by-rule and beneficial use provisions of the residual waste regulations.

### **Residual Waste Requirements**

A generator who generates more than an average of 2,200 lbs of all residual waste per generating location per month of the previous year is required to prepare a SRS.

### **Hazardous Waste Requirements**

A generator who generates more than 1,000 kilograms of hazardous waste in any month of the year is required to prepare a SRS.

### **General Requirements**

The SRS must be available on-site for inspection and must be submitted:

- with a Form U or Module 1 (for the disposal or processing of waste at a permitted site),
- with a permit application, or
- upon request by the department.

The SRS shall be updated when there is a significant change in the manufacturing process or every five years.

Regulatory References:

*Hazardous Waste Regulations*

§260a.10 (definition of “source reduction”)  
§262a.100 (source reduction strategy)  
§264.73(b)(9) (Operating Record)  
§262.23(a)(1) (Certification)

*Municipal Waste Regulations*

§271.1 (definition of “source reduction”)  
§271.612 (Additional Application Requirements)

*Residual Waste Regulations*

§287.53 (duties of generators: source reduction strategy)  
§287.1 (definition of “source reduction”)  
§287.52(b)(6) (biennial reports)  
§287.133 (waste analysis: source reduction strategy)

SRS Options:

1. If you have established a source reduction program and know what action you will take to reduce this waste stream then the general information and Sections A, B, and C should be completed.
2. If you are proposing to do nothing to reduce the quantity or toxicity of waste, then the general information and Sections A, B, and D should be completed.
3. If you have established a program but are still evaluating what you will do, you should complete the general information plus the applicable sections of A, B, C and D. You should present the ongoing source reduction evaluations which will lead to a completed strategy.

**FORM 25R****SECTION A. APPLICANT IDENTIFIER**

Applicant Name: \_\_\_\_\_

**SECTION B. GENERAL INFORMATION**

This section must be completed.

Generator: \_\_\_\_\_

Contact Person: \_\_\_\_\_

Phone Number: \_\_\_\_\_

Mailing Address: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Facility Address: \_\_\_\_\_

(if different from mailing address) \_\_\_\_\_

Facility SIC Code(s): \_\_\_\_\_

The information contained in this form is true and correct to the best of my knowledge and belief.

\_\_\_\_\_  
Name of Responsible Official\_\_\_\_\_  
Signature of Responsible Official\_\_\_\_\_  
Date1. Waste stream name and description: ☐ Residual waste ☐ Hazardous waste

2. Describe source reduction actions taken during the past five years. You should quantify any reduction in the weight or toxicity or waste and maintain records to document this reduction. This question is intended to give recognition for past source reduction achievements.

3. State whether you have established a source reduction program. You may include a statement of top management's support or corporate source reduction goals.

Complete this section if you have established a source reduction program and are proposing to take action to reduce the quantity or toxicity of this waste.

1. Describe the methods and procedures that you will use to achieve source reduction for this waste.
2. Quantify the projected reduction by weight or toxicity for each technique described in #1. You may use the method of measurement most appropriate for the waste and the generating process. Discussion of several measurement options is contained in the "Source Reduction Strategy Manual."
3. Specify when each method or procedure described in #1 will be implemented.

method or procedure

implementation

Complete this section if you have not established a source reduction program for this waste stream, that is, if you are not proposing to take any action to reduce the quantity or toxicity of the waste.

1. Characterize the waste stream, including source, hazards, chemical analyses, properties, generation rate, management techniques and management costs.
2. Describe all the potential source reduction options that you have considered.
3. Describe in detail how each option was evaluated. Include the specific technical, economic, or other criteria that were used.

**FORM 25R****Section D.**

4. Explain why each option was not selected.

**Summary of Section D**

method or procedure	why not selected