

Solid Waste Interested Parties (SWIP) Fall 2019 Meeting

November 7, 2019

9:00-12:00

Fitchburg



Program Updates

Joe Van Rossum





Program Updates

- Program Strategic Planning Effort
- LAB – Evaluation of Recycling Program
- Waste Characterization Study
- E-cycle and RU Workshops
- Hazardous Waste Webinars
- Evaluating Mobile Inspection tool
 - Developed by EPA
 - Haz Waste Inspection only



Updates Continued - Performance Metrics

- Plan Review timeliness - 93% on-time
- Inspection targets
 - Number of inspections
 - Response times
- Complaint Response (>400/yr)
- Owner Financial Responsibility
- Tracking IT projects



Rule Making

- NR 600
- NR 538
- Electronics Recycling
- State Permit Program for CCR



Staffing Updates

- Turn-over continues
 - Active employment market
 - Quality candidates
- On-boarding new staff
 - Training
 - Field visits
 - Mentoring
 - Consistency
- Up-coming recruitments



Guidance Documents/Website

- Act 369 Impacts
 - Focus on recertifying existing
 - Slowly working in new
 - Evaluating beyond traditional guidance
- Department wide website redesign
 - Expected to launch 2nd quarter 2020



Upcoming Events & Meetings

- PFAS Waste subgroup – This afternoon
- WMM Study Group 12/6
- Full PFAS TAG – 12/13 10:00am

Solid Waste Program Revenue

Annual update per NR
520.04(1)(d)(5)

David Albino



Program Revenue Account Status

	FY 17	FY 18	FY19	FY20
	Actual	Actual	Actual	Estimated
Opening Balance	\$ 211,891	\$ 246,704	\$ 366,116	\$ 1,126,904
Revenue Sources	FY 17	FY 18	FY19	FY19
SW landfill license surcharge	\$ 1,016,582	\$ 1,043,227	\$ 1,059,706	\$ 1,000,000
SW landfill licenses	\$ 475,865	\$ 370,974	\$ 572,550	\$ 540,000
SW C & T licenses	\$ 239,084	\$ 422,184	\$ 364,490	\$ 390,000
SW disposal other licenses (i.e. Non-Landfill Facilities)	\$ 120,010	\$ 139,961	\$ 122,210	\$ 115,000
SW plan review fees	\$ 365,240	\$ 346,370	\$ 420,555	\$ 350,000
HW facilities licenses	\$ 89,600	\$ 90,000	\$ 83,632	\$ 80,000
HW transporter licenses	\$ 85,250	\$ 81,721	\$ 73,200	\$ 83,000
HW plan review fees	\$ 1,600	\$ -	\$ -	\$ 8,000
HW manifest fee	\$ 144,978	\$ 138,966	\$ 65,880	\$ 10,000
SW Facility Oper/Mgr Cert Fees	\$ 28,795	\$ 28,550	\$ 37,300	\$ 25,000
Misc (i.e. infect & medical waste / copying sales / printing)	\$ 6,319	\$ 115,959	\$ 47,696	\$ 35,200
Total Revenue	\$ 2,573,323	\$ 2,777,912	\$ 2,847,219	\$ 2,636,200
Total Available: (All Revenue Sources + Opening Balance)	\$ 2,785,214	\$ 3,024,616	\$ 3,213,335	\$ 3,763,104
Total Expenditures	\$ (2,258,606)	\$ (2,740,129)	\$ (2,323,503)	\$ (3,000,000)
Total Expenditures & Budget Lapses	\$ (2,258,606)	\$ (2,740,129)	\$ (2,323,503)	\$ (3,000,000)
DOA adjustments to A/R Accounts	\$ (279,904)	\$ 81,629	\$ 237,071	\$ -
Closing Balance	\$ 246,704	\$ 366,116	\$ 1,126,904	\$ 763,104
	FY 17	FY 18	FY 19	FY 20



Program Revenue 20% Balance

Fiscal Year	Expenditure Level (<i>dg</i>)	20% Cap	PR Account Balance	Actual % (PR Account Bal / Expenditure Level)	
FY15	\$ 2,576,300	\$ 515,260	\$ 174,826	6.79%	Actual
FY16	\$ 2,576,300	\$ 515,260	\$ 211,900	8.22%	Actual
FY17	\$ 2,591,700	\$ 518,340	\$ 246,704	9.52%	Actual
FY18	\$ 2,591,700	\$ 518,340	\$ 366,116	14.13%	Actual
FY19	\$ 2,591,700	\$ 518,340	\$ 1,126,904	43.48%	Actual
FY20 -estimated	\$ 2,728,600	\$ 545,720	\$ 763,104	27.97%	Estimated

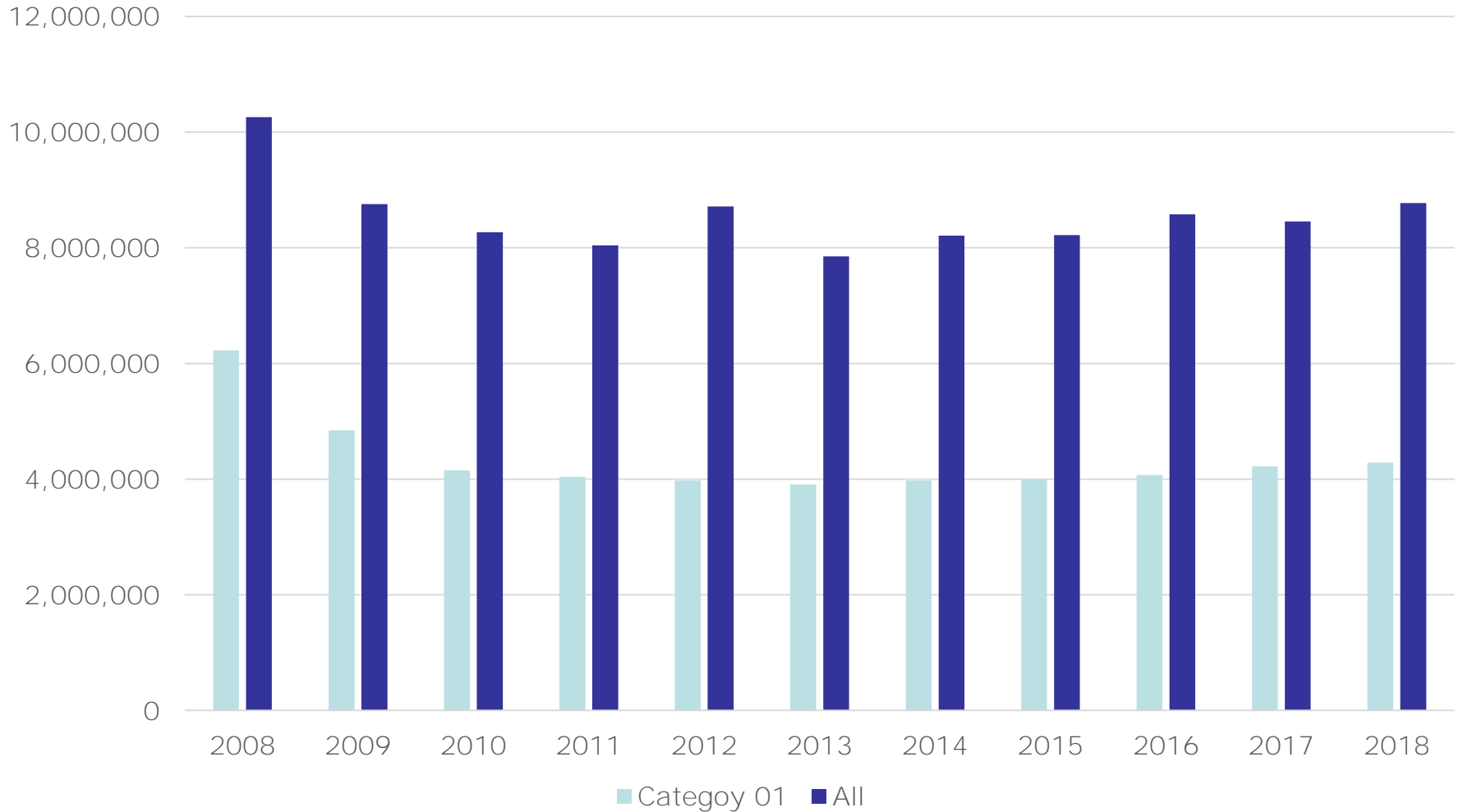
If, for 3 consecutive fiscal years the PR Account Balance is >20% of the Expenditure Level, the DNR must propose rule revisions to lower the landfill license fee surcharge.

NR 520.04(1)(d)5



Landfill Tonnage

Landfill Tonnage – Yearly Totals





OVERVIEW OF STATE ENVIRONMENTAL FUND

November 7, 2019

Paul Neumann, DNR Bureau of Management &
Budget

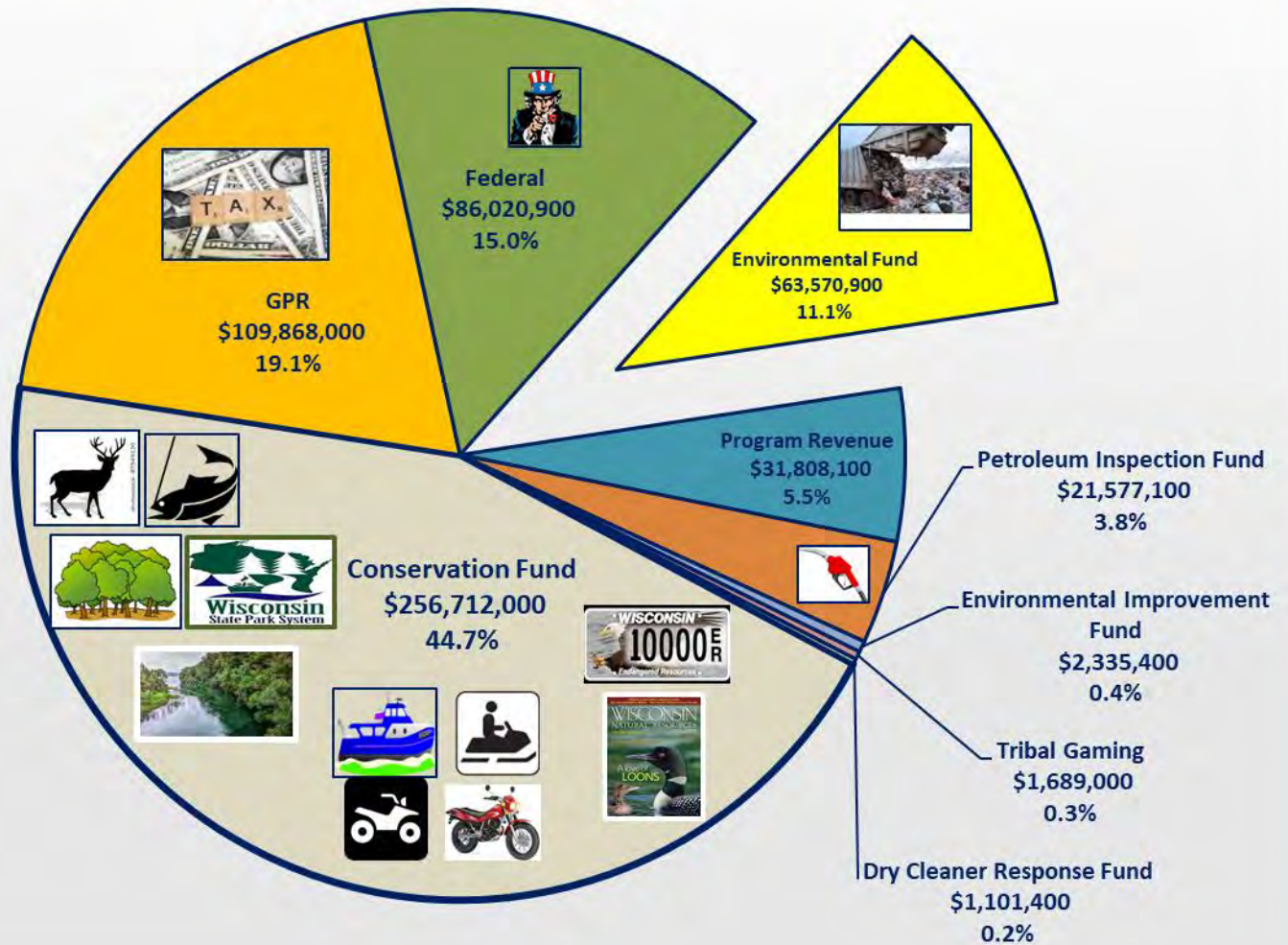
(608) 266-0818,

paul.neumann@wisconsin.gov

DEPARTMENT OF NATURAL RESOURCES

FY 2020 Budget, By Funding Source

(Total: \$574.7 million)





ENVIRONMENTAL FUND

ENVIRONMENTAL MANAGEMENT ACCOUNT

Waste & Recycling

Contaminated land cleanup

Groundwater

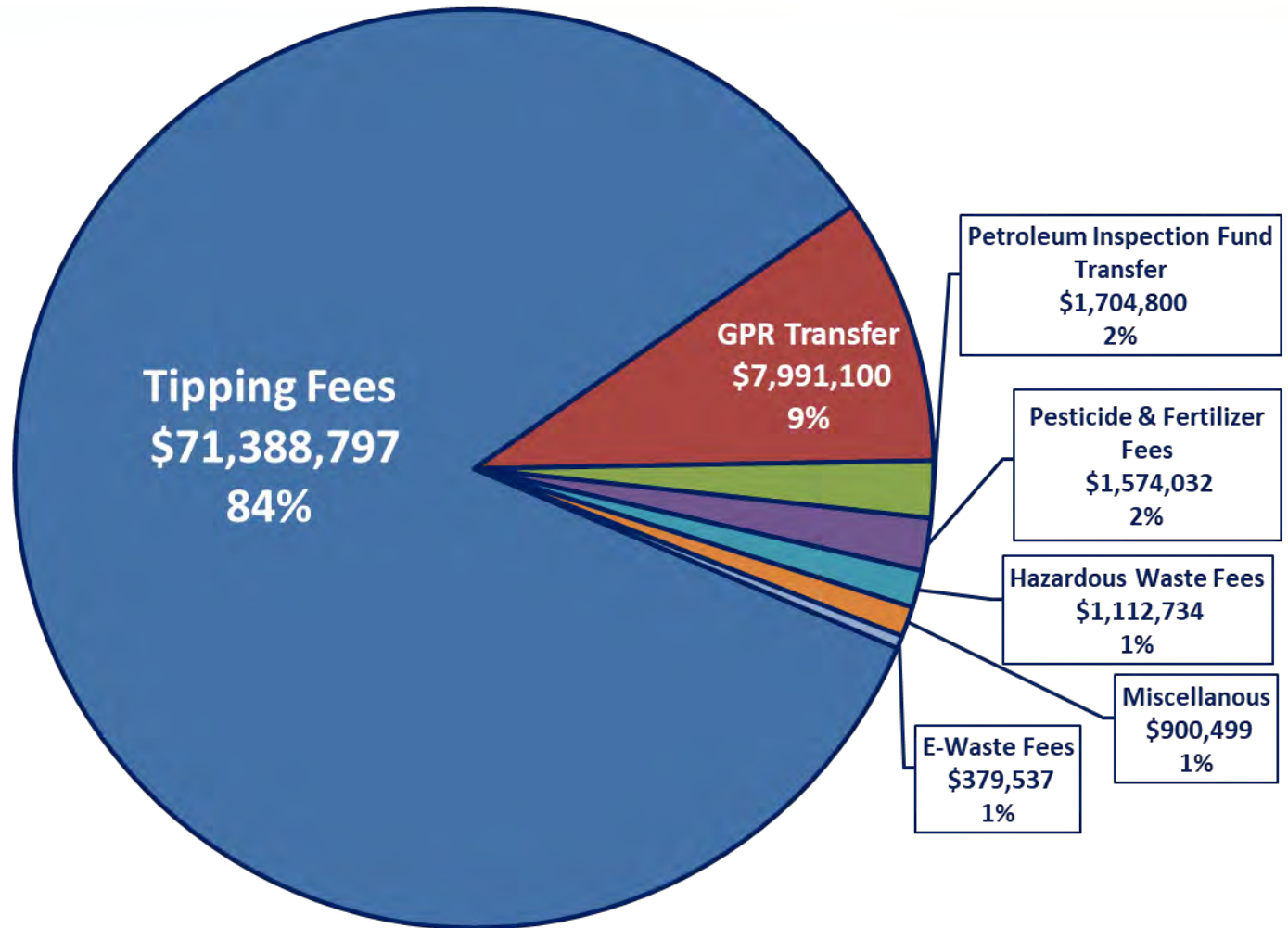
NONPOINT ACCOUNT

Ag Runoff

Urban Runoff

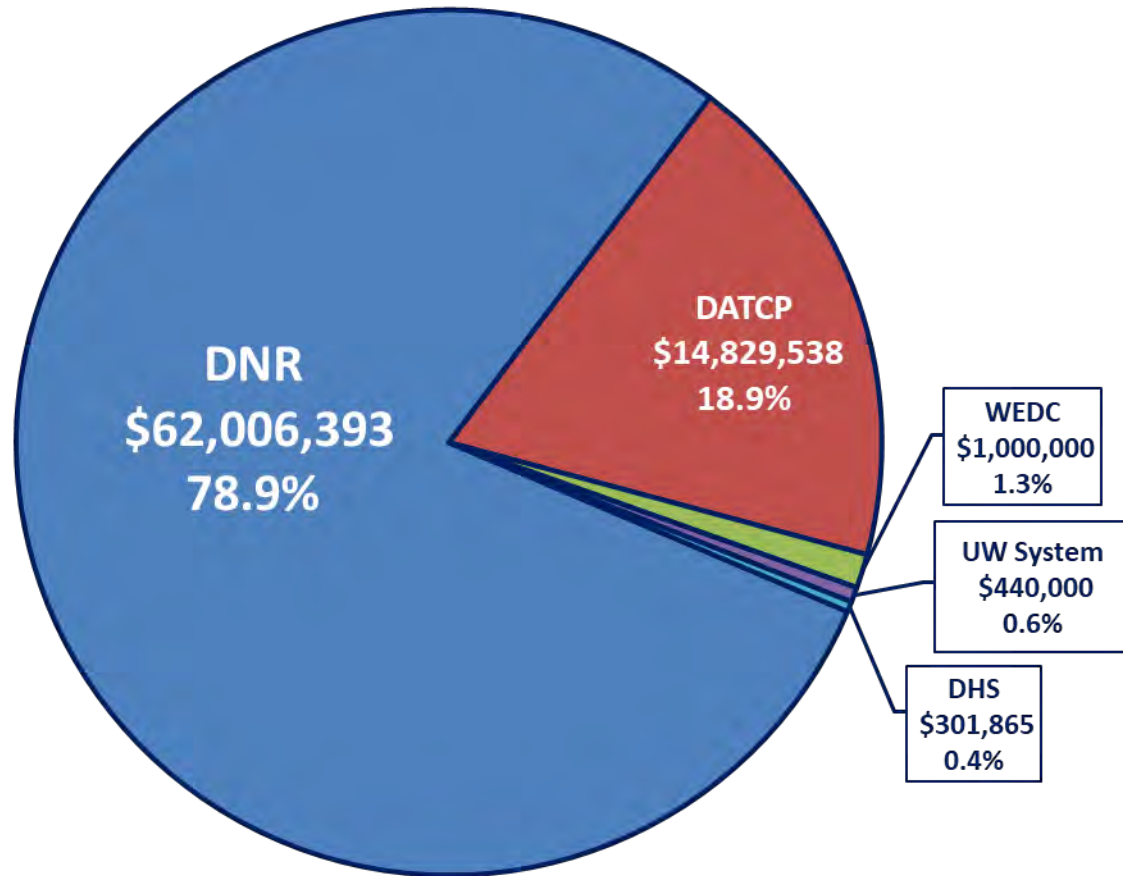
ENVIRONMENTAL FUND REVENUES

(FY 2018 Total: \$85.1 million)



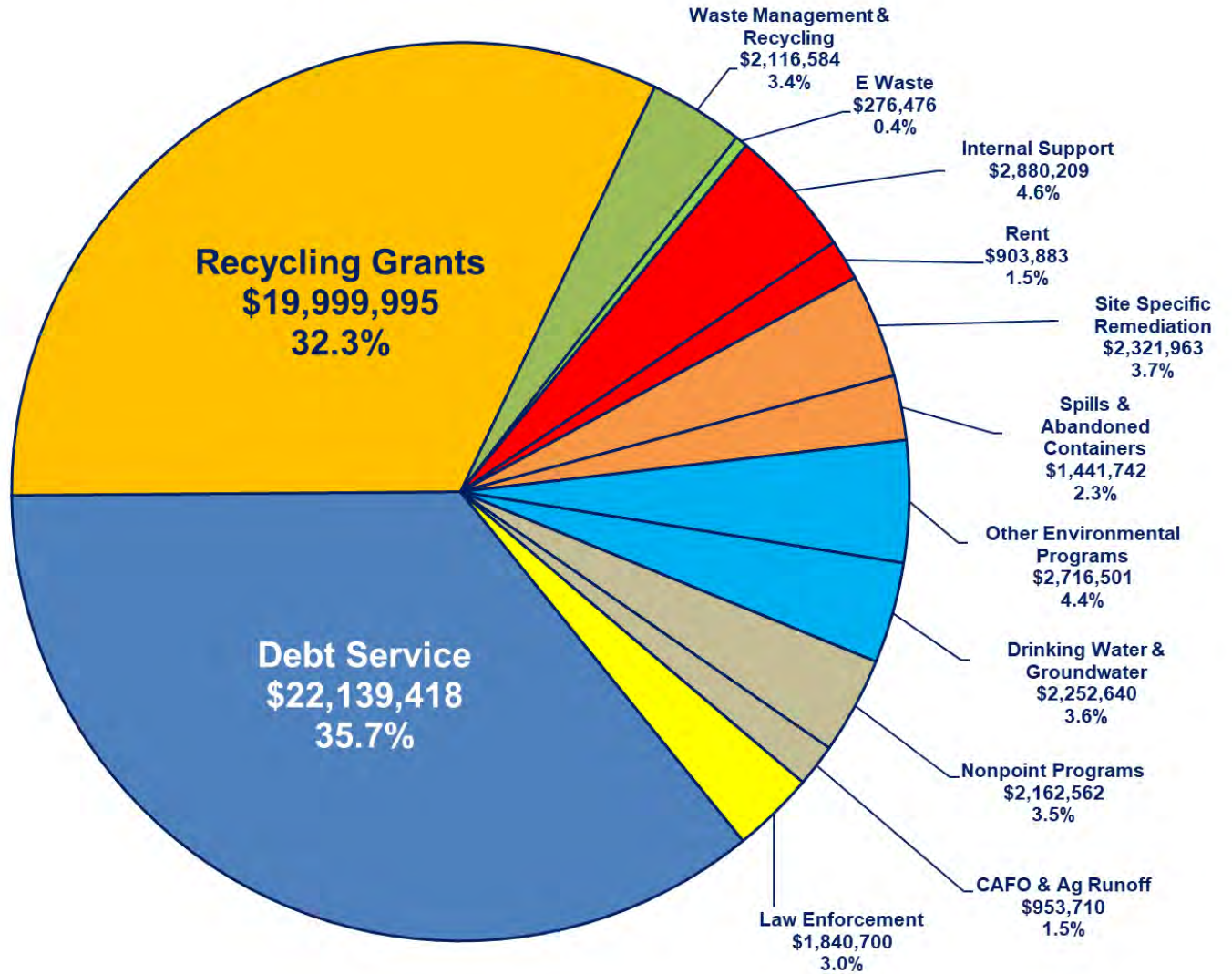
STATE AGENCY DRAWS ON ENVIRONMENTAL FUND

(FY 2018 Total: \$78.6 million)



DNR DRAWS ON ENVIRONMENTAL FUND

FY 2018 Total: \$62.0 million)



Recycling Annual Report Data and Current Topics

Jennifer Semrau

Waste Reduction & Diversion
Coordinator



Recyclable Materials Collected by Wisconsin Responsible Units (in tons)

Mandatory Reporting - Banned¹	2018	% Change from 2017	% Change from 2009
Old corrugated cardboard (OCC)	67,593	↓ -9.3%	↑ 32%
All other paper ²	188,627	↓ -3.2%	↓ -14%
Aluminum containers	6,208	↓ -4.8%	↑ 42%
Steel (tin)/bimetal containers	16,718	↓ -0.2%	↑ 33%
Glass containers	94,835	↑ 3.2%	↑ 5%
Plastic containers #1-7	47,344	↑ 23.3%	↑ 24%
Foam polystyrene packaging ³	171	↑ 140.2%	N/A
Total Mandatory Reporting	421,495	→ 0.0%	↑ 2.7%

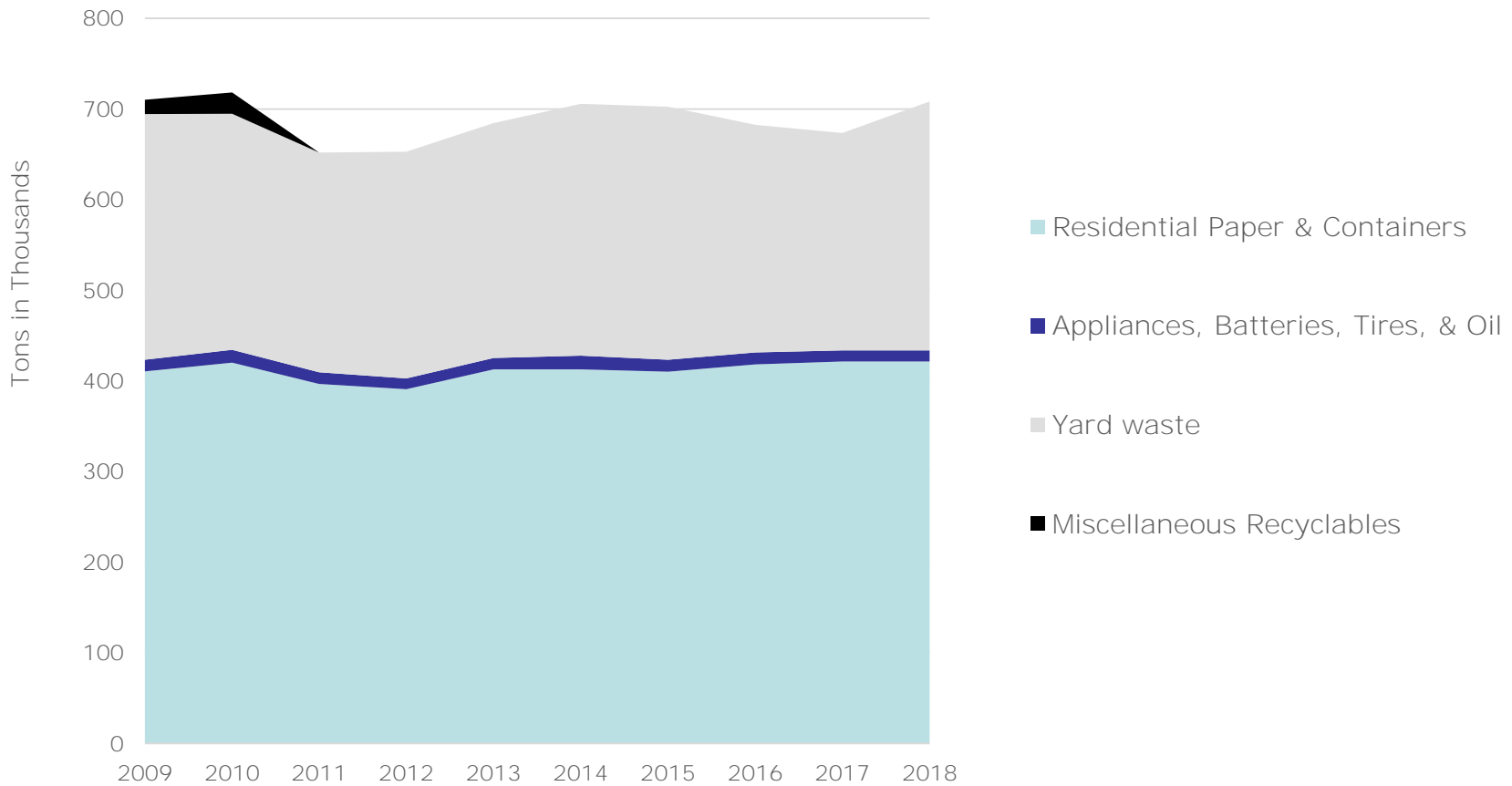
Optional Reporting - Banned¹	2018	% Change from 2017	% Change from 2009
Appliances	4,991	↓ -10.8%	↑ 14.4%
Tires	5,558	↑ 21.0%	↑ 4.8%
Batteries (lead acid)	274.51	↑ 12.5%	↓ -75.0%
Used oil	2,037	↑ 14.2%	↓ -29.8%
Electronics ⁴	4,600	↓ -12.9%	N/A
Yard waste	274,725	↑ 13.5%	↑ 1.4%
Total optional reporting	292,185	↑ 12.7%	↑ 2.9%

Total Reporting	2018	% Change from 2017	% Change from 2009
Total Mandatory Tons Reported by RUs	421,495	↑ 0.0%	↑ 2.7%
Total Tons Reported by RUs	713,680	↑ 5.0%	↑ 0.5%
WI Population	5,837,059	↑ 0.6%	↑ 2.6%
Per capita mandatory reporting (lbs)	144	↓ -0.9%	↓ -0.2%
Per capita total reporting (lbs)	245	↑ 4.6%	↓ -1.9%

¹ Wisconsin Recycling Law bans these materials from landfills
² Includes some non-banned paper, primarily residential mixed paper
³ Variance - released from bans
⁴ Electronics were banned from landfills starting in 2010

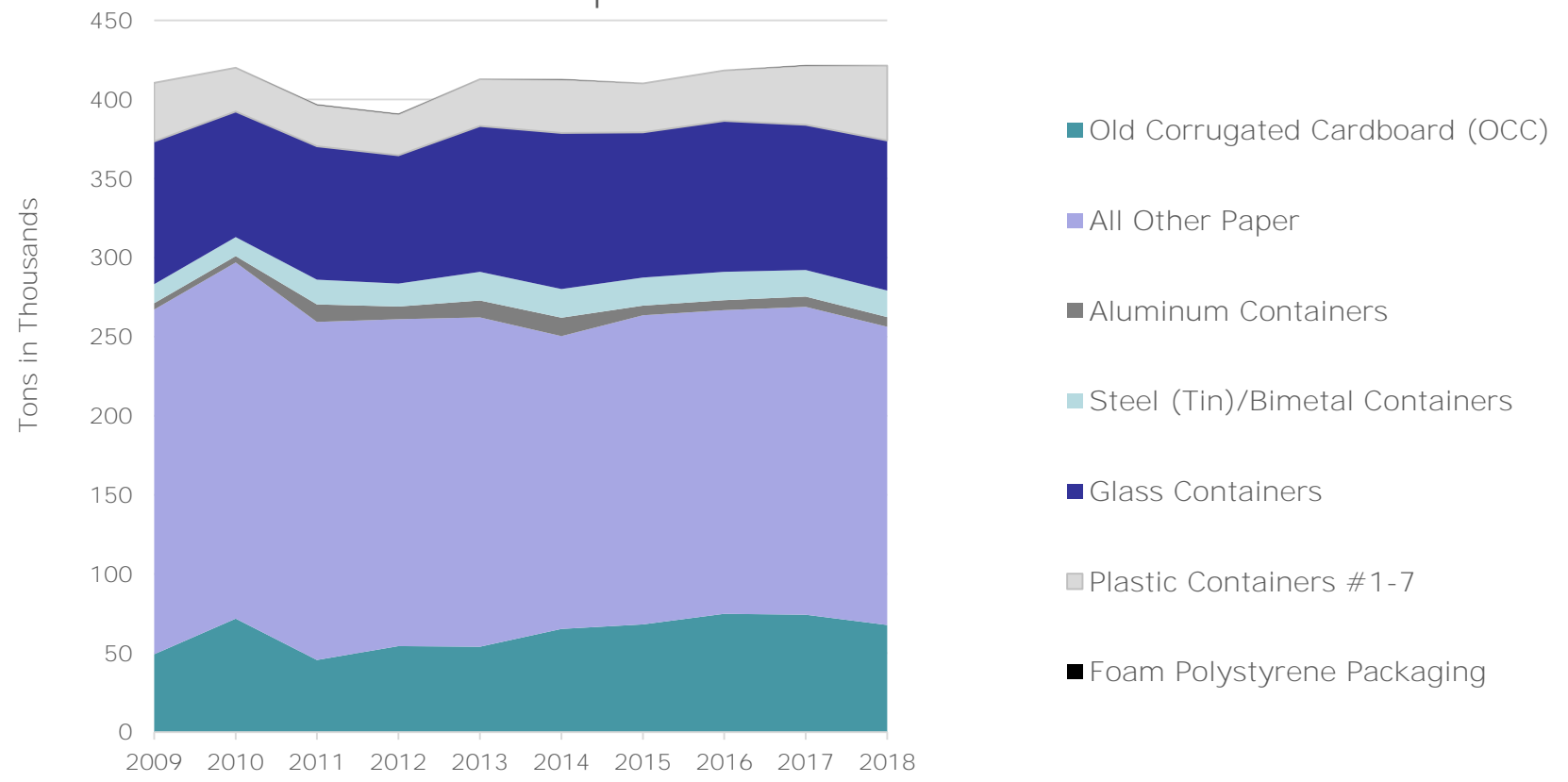
Responsible Unit Data Trends: All Recyclables

All Recyclable Materials Collected from Responsible Units
2009-2018



Responsible Unit Data Trends: Mandatory Reporting- Banned Materials

All Mandatory Banned Recyclable Materials Collected from Responsible Units 2009-2018



Recyclable Materials Collected by Wisconsin Self-Certified MRFs (in tons)

Mandatory Reporting - Banned¹	2018	% Change from 2017	% Change from 2009
Old corrugated cardboard (OCC)	251,984	↑ 14.1%	↑ 6.2%
All other paper ²	303,713	↑ 0.2%	↓ -8.1%
Aluminum containers	8,702	↑ 13.2%	↑ 22.8%
Steel (tin)/bimetal containers	18,840	↑ 11.2%	↑ 17.5%
Glass containers	123,958	↓ -3.2%	↑ 31.9%
Plastic containers #1-7	52,787	↑ 18.6%	↑ 39.8%
Foam polystyrene packaging ³	4	↓ -15.2%	↓ -194.6%
Total Mandatory Reporting	759,988	↑ 5.7%	↑ 6.2%

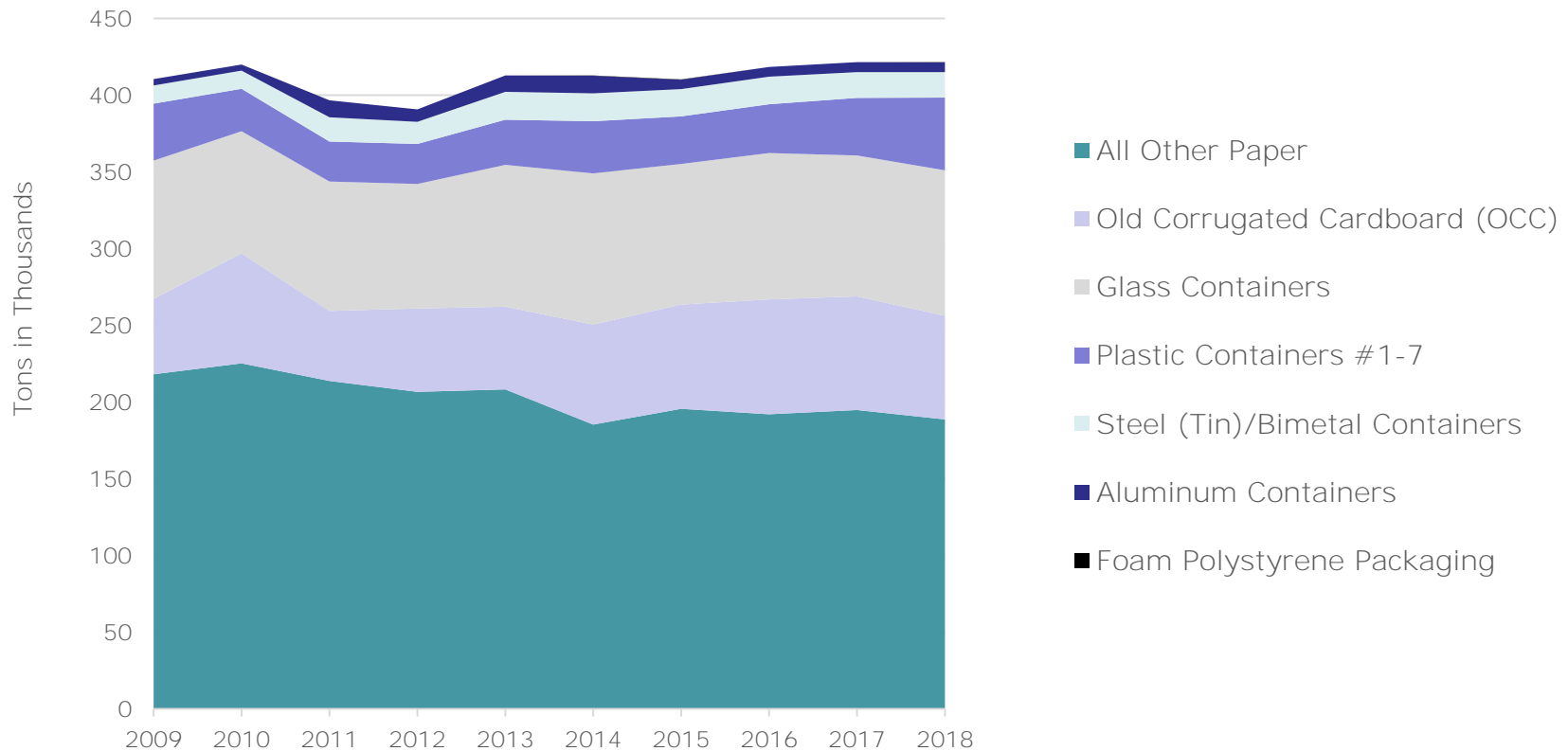
¹ Wisconsin Recycling Law bans these materials from landfills

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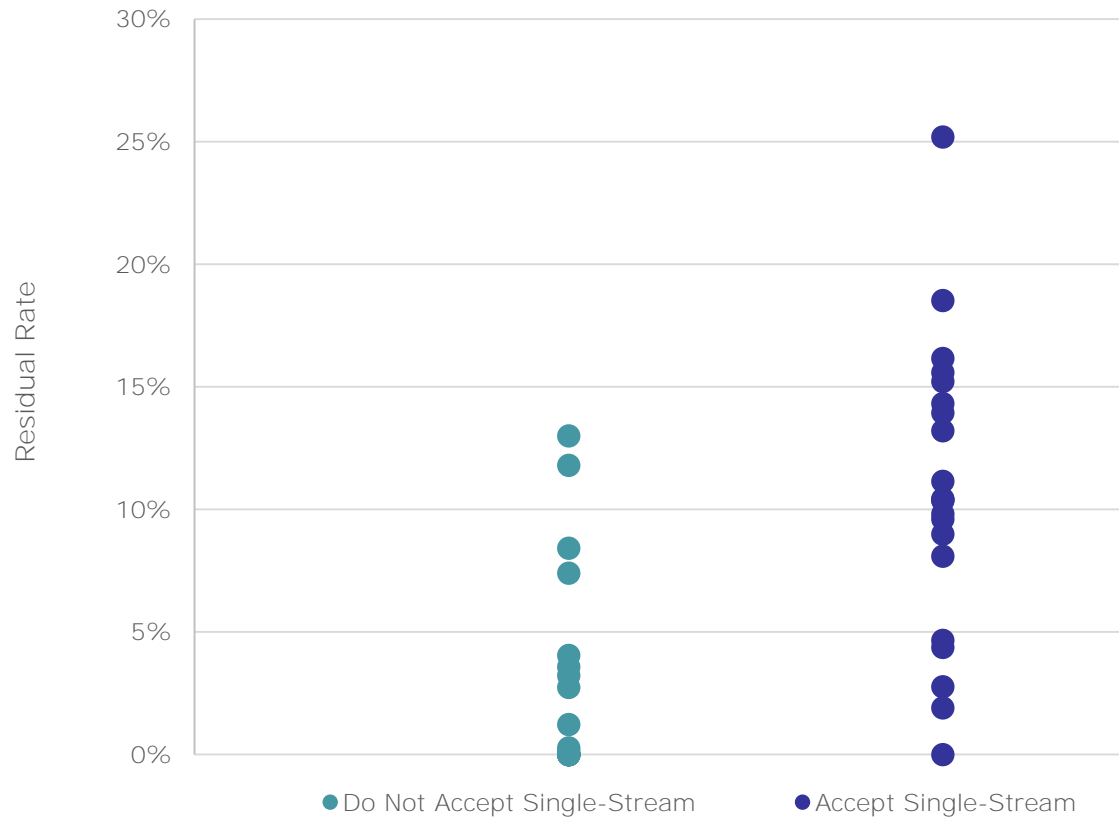
Self-Certified MRF Data Trends: Mandatory Reporting- Banned Materials

All Mandatory Banned Recyclable Materials from RUs
Processed by Self-Certified MRFs 2009-2018



Self-Certified MRF Residual Rate Comparison

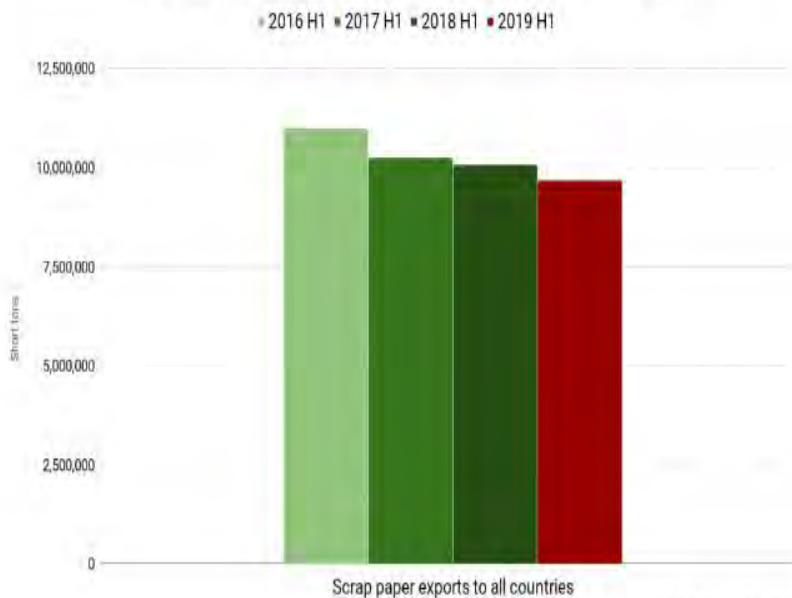
Residual Rates Based on % Received for All (41) Self-Certified MRFs



Changing Recycling Marketplace

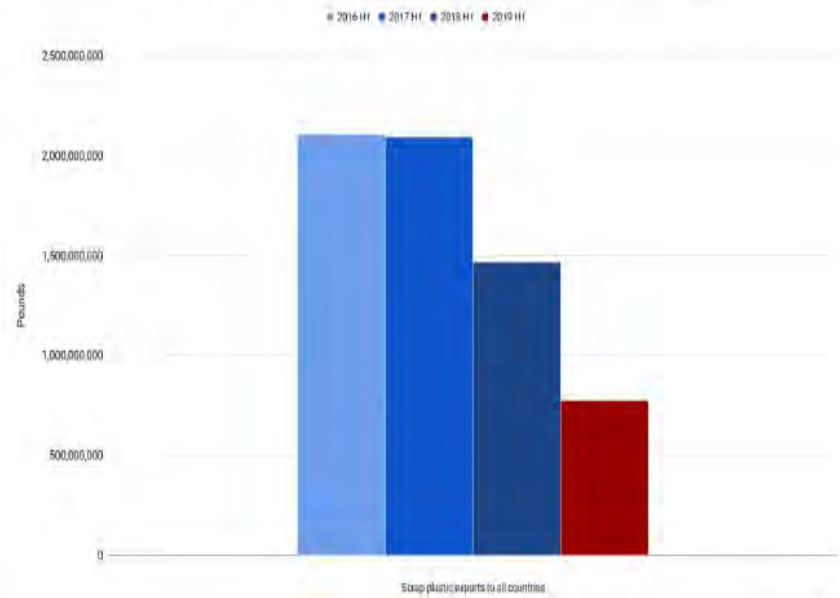
Impacts of 'National Sword' continue to be felt: Recycled plastic imports to China fell by 99% in 2018 compared with 2017; paper imports fell by 1/3

U.S. scrap paper exports to all countries, January-June, 2016-2019 (pounds)



© Resource Recycling, Inc.

U.S. scrap plastic exports to all countries, January-June, 2016-2019 (pounds)



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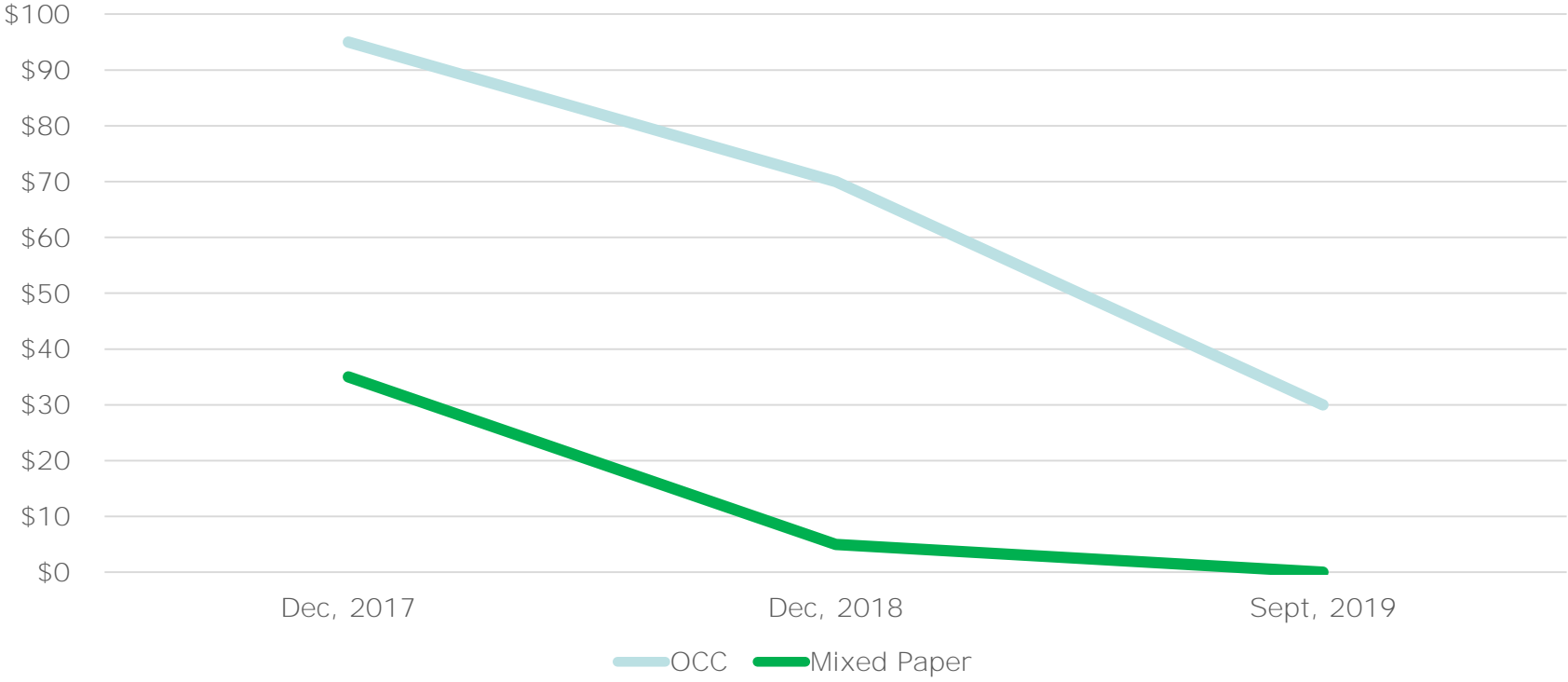


Domestic Pricing/Value of a Ton

- Fiber grades are facing historic low prices
- During 2019:
 - OCC decreased from \$70 to \$30/ton
 - Mixed paper decreased from \$5 to \$0/ton (may go negative)
 - UBC/Aluminum \$1,100-\$1,300/ton
 - Steel/tin \$35-\$40/ton
 - PET decreased from \$330 to \$245/ton
 - HDPE natural from \$840 to \$430 to \$520/ton
 - HDPE color decreased from \$400 to \$220/ton
- Composite value of a ton of recycling has fallen from \$70-90 in 2017 to \$30-50 in 2019
- Present mixed commodity value \$25-\$35/ton
- 2x-3x value in processing costs

Paper Pricing Trends

Paper Pricing (Chicago)



Source: PPI Pulp & Paper

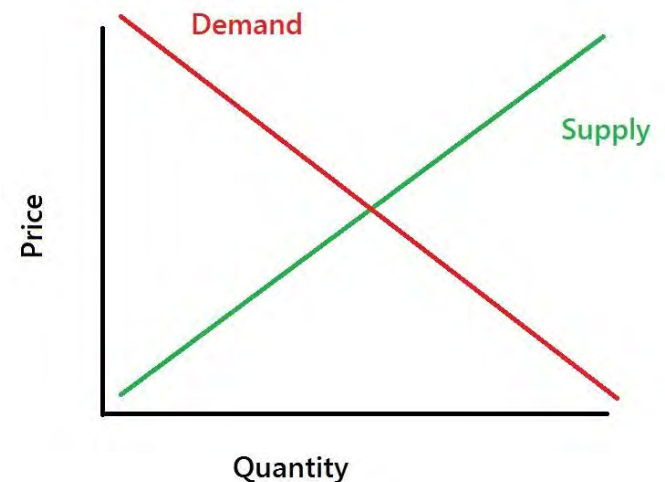
Impact on WI's Recycling Programs

Material Recovery Facilities (MRFs)

- Need to produce clean, high quality bales with very little contamination
- Receiving less per ton for those products
- Passing increased costs to customers: haulers and local governments

Local governments

- Should anticipate higher costs when seeking new pricing or going out for bid
- Focus on education: what you can and cannot recycle



Enough Discouraging News...



While export markets are decreasing, there IS significant domestic **infrastructure development...**
Especially in fiber



Domestic Infrastructure Development

- ND Paper, Biron, WI; OCC/mixed; 2020; 760K
- Green Bay Packaging, GB, WI; OCC/mixed; 2021; 685K
- Pratt Industries, Wapakoneta, OH; OCC/mixed; 2019; 396K
- Verso Corp, Duluth, MN; OCC; 2020; 48K
- Phoenix Paper, KY; OCC/mixed; 2020; 700K
- ND Paper, WV; SOP/news; 2020; 240K
- Cascades, VA; OCC/mixed; 2021; 440K
- CorrVentures, NY; OCC; 2021; 300K
- ND Paper, ME; OCC/mixed; 2020; 480K
- Crossroads Paper, UT; OCC/mixed; 2022; 350K
- & two plastic facilities in GA & SC

Source: [Resource Recycling](#)



What is DNR doing?

Communicating with RUs, haulers, MRFs

- Reminding all of recycling requirements/law
- Outreach to via DNR Facebook, Recycling Updates, presentations, etc.

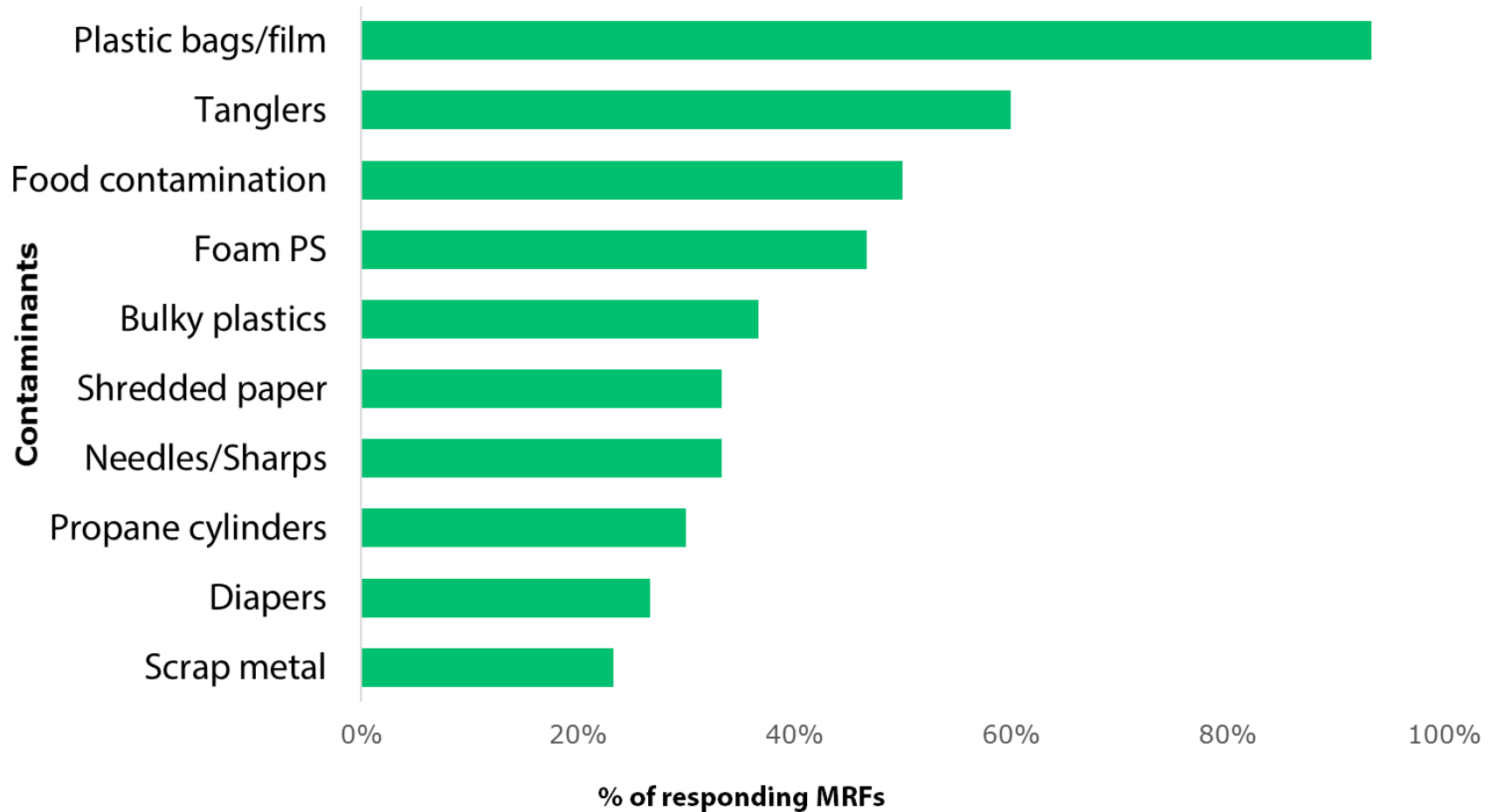
MRFs

- MRF survey, spring 2019
 - **What do facilities accept/recycle; don't accept/detrimental**
 - Materials they are struggling to market
 - Biggest contamination concerns
- MRF Stakeholder meeting, Oct. 7
 - Bring MRFs together to discuss concerns
 - Update on market conditions, results of survey, resources

Anti-contamination messaging

- Do not bag recyclables; no plastic bags
- Cords/tanglers, food, Styrofoam, sharps, batteries, etc.

Problematic Contamination





Breaking News: Recycling Audit

- Joint Audit Committee of the Legislature is requesting audit of State Recycling Program
- Non-partisan Legislative Audit Bureau will conduct audit
- 2001 - last audit of the recycling program
- Scope includes recycling grants to RU, amounts recycled/expenses by RUs, state administration of program, current market conditions/challenges, how other states operate recycling programs, identify BMPs & areas of improvement
- **Also includes 'Clean Sweep'**
- Completion by spring, 2020

Complete scope statement:
https://legis.wisconsin.gov/lab/media/2912/091919_scope_state-recycling-programs.pdf



Questions?

Jennifer Semrau

Waste Reduction and Diversion Coordinator

608-267-7550

Jennifer.Semrau@wisconsin.gov





Solid Waste Reminders and Current Topics

Casey Lamensky



Storm Debris Landfill Fee Exemptions

- \$12.997 waived
- Must be storm debris from disaster cleanup effort that has been segregated
- Only from state or federal declared emergency
(https://docs.legis.wisconsin.gov/code/executive_orders/2019_tony_evers)
<https://dnr.wi.gov/topic/waste/stormdebris.html>)
- Disposed of within 60 days (starting day after the last day of the declared event)
- Category 28 waste



Treated Infectious Waste Manifesting

- Assumed IW (requires treatment)
 - Medical sharps
 - Bulk blood and body fluids
 - Human tissue
 - Microbiological lab waste
 - Bulk blood, body fluids, tissue from zoonotic infectious animals



Treated Infectious Waste Manifesting

- USDOT shipping papers or IW manifest
- Generator, (transporter(s)), (storage facility), treatment facility, disposal facility
- Waste composition and quantity
- Signatures
- 3 year retention times



Carcass Disposal

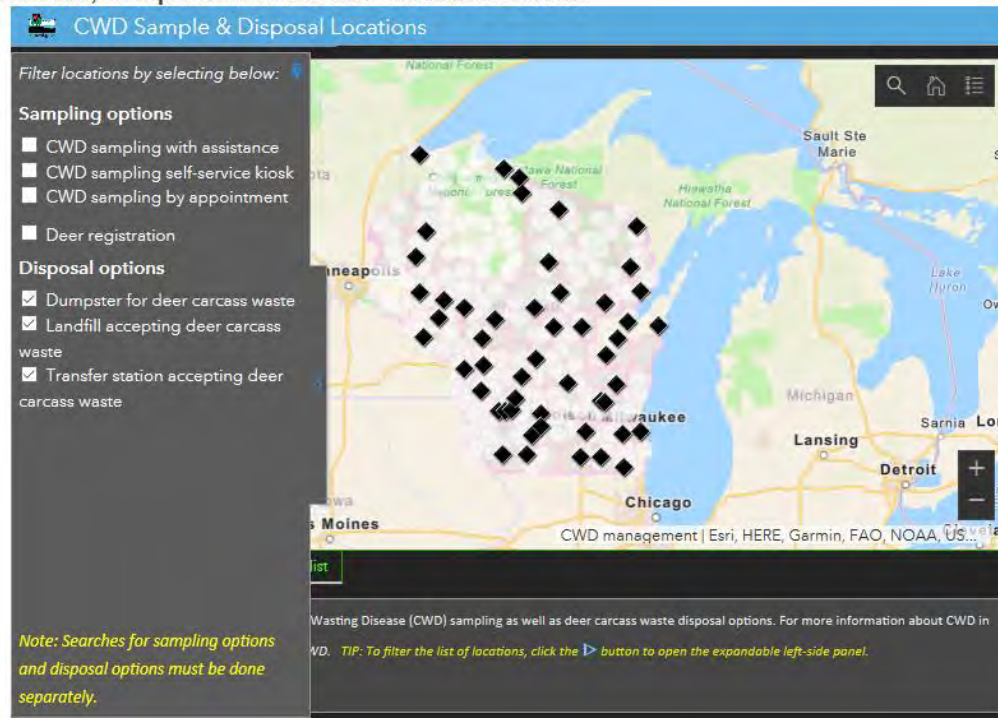
- Hunters - DNR is recommending double bagging and landfill disposal at landfill that accept them
- Businesses - landfill disposal at a landfill that accepts them is required
- **If you get questions but don't accept** please direct to <https://dnr.wi.gov/topic/hunt/landfillmap.html>
- Adopt a dumpster

Carcass Disposal

- FAQ guide:

<https://dnr.wi.gov/topic/hunt/documents/deerdisposalfaq.pdf>

Landfill, dumpster and transfer station locations



CWD Sample & Disposal Locations

Filter locations by selecting below:

Sampling options

- CWD sampling with assistance
- CWD sampling self-service kiosk
- CWD sampling by appointment
- Deer registration

Disposal options

- Dumpster for deer carcass waste
- Landfill accepting deer carcass waste
- Transfer station accepting deer carcass waste

Note: Searches for sampling options and disposal options must be done separately.

Wasting Disease (CWD) sampling as well as deer carcass waste disposal options. For more information about CWD in WI. TIP: To filter the list of locations, click the ▶ button to open the expandable left-side panel.



Peer Review Process for Consistency

Casey Lamensky (Non-Landfill
Plan Review)

Valerie Joosten (Landfill Plan
Review)



Non-Landfill Peer Review

- Goals
 - Consistency across regions
 - A single topic expert with most recent information and proposals
 - Continued learning
 - Efficiency by topic
 - Use of most effective plan review ideas
 - Training (writing and reviewing)
 - Second opinion



Non-Landfill Peer Review

- Roles
 - Primary Reviewer
 - Topic Expert
 - Reviewer from different region (changes annually)
 - Regional Supervisor



Non-Landfill Peer Review

- New facility type to reviewer
 - Full review with topic expert
 - Approval review by different region and sw coordinator
- Precedent setting proposal
 - Full review with topic expert
 - Approval review by sw coordinator
- Routine plan review
 - Full review by different region 1x/yr
 - Approval review by different region all



Non-Landfill Plan Review

- Topic Expert Categories

Review type
502.08(2)(i)
Tire processing and storage
Processing (non tire, C&D, IW)
Storage (non tire)
Transfer
Composting (non processing)
Landspreading
Woodburning
C&D processing
LHE
IW processing



Landfill - review types

Plan review

- Lead staff
- Joint reviews may include:
 - Mentor
 - Expert(s)
 - Engineer / Hydro team

Decision review

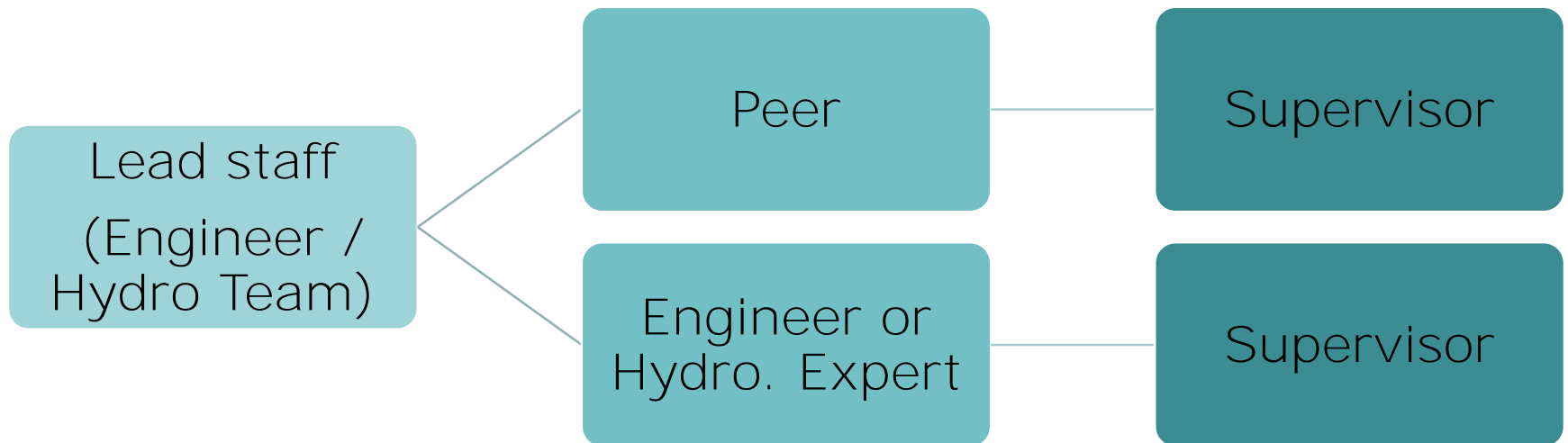
- Plan review expert(s) or Peer
- Supervisor

Decision document review

**Draft decisions &
initial peer review**

Peer review

**Final review by
signatory**



*internal guidelines determine review path

Plan and peer review guidelines - example

Last Revised: 2/8/2019	Lead Reviewer- Typical - (Lead Decision Drafter)				Joint Reviewer(s) (Receives E-Copy or Hard- Copy Submittal)				Draft Decision Reviewer(s) ⁴					Send E-Copy of Decision To ⁴			
Submittal Type	Hydro Expert	Hydro	Eng. Expert	Eng.	Hydro Expert	Hydro	Eng. Expert	Eng.	Hydro Expert	Hydro	Eng. Expert	Eng.	Peer	Hydro Expert	Hydro	Eng. Expert	Eng.
Initial Site Inspection / Initial Site Report	-	X	-	-	O	-	O	X	X	-	O	X	-	X	X	X	X
Alternative Geotechnical Feasibility Report	-	X	-	-	X	-	O	X	X	-	O	X	-	X	X	X	X
• Incompleteness/ Completeness	-	-	-	-	-	-	-	-	X	-	X	X	-	X	X	X	X
Plan of Operation	-	-	-	X	X	X	X	-	X	X	X	-	-	X	X	X	X
• Incompleteness/ Completeness / Significant Request for Info.	-	-	-	-	-	-	-	-	X	X	X	-	-	-	X	X	X
Construction Documentation																	
• Liner / Final Cover / Other major	-	-	-	X	-	O	-	-	-	O	-	-	X	-	X	X	-
• Landfill Gas / Other minor	-	-	-	X	-	O	-	-	-	O	-	-	X	-	X	X	-

O = optional; x = required



Roles

- Lead staff - responsible plan reviewer
- Hydro / engineer teams
 - support or specialty area, familiarity with facility
- Peer reviewer
 - Peer check of standard decision documents (final review)
- Expert(s)
 - focus on consistency, technical and regulatory requirements
 - precedent setting issues
- Supervisor
 - final check and signatory



Goals

- Consistency
- Enhance skills
- Maintain standards
- Peer support
- Quality control
- Early involvement



Initial site inspections for clay borrow sources

Valerie Joosten



Soil borrow sources for landfills

NR 504.075

- Applicability:
 - Sources for constructing, operating or closing landfills
 - New sources and expansions
- Requirements:
 - Initial site inspection (ISI)
 - Written approval (plan of operation or modification)



Clay borrow source exemptions

NR 504.075(2)(a)

- Production of processed aggregate
- Construction projects off of the landfill property, other than for:
 - compacted clay liner or cap,
 - soil barrier layer,
 - leachate collection layer
 - Final cover drain layer



Clay borrow ISI exemptions

- NR 504.075(b)
 - Sources within proposed or approved limits of filling of landfill
 - Areas where soils are obtained from excavation projects for purposes other than construction, operation or closure of a landfill
- NR 509.04
 - Commercial soil borrow sources



Commercial or noncommercial

- Commercial – operates in a market (i.e., sells soil to any person) and primary motive of doing business for profit.
 - E.g. owned by a separate business entity from the landfill operator or one which serves multiple different landfill operators
- Noncommercial – serves a specific landfill (NR 509.04(1), Wis. Adm. Code)



Contents of a clay borrow ISI request

- See NR 509.04(4) and(5)
 - Cover letter
 - Topo
 - Threatened and endangered species, wetlands, surface waters and historical/archeological
- Checklist – draft pending recertification
<https://dnr.wi.gov/files/PDF/pubs/wa/wa1185.pdf>
- Other helpful links:
 - Link to Endangered/ Threatened Species Review:
<https://dnr.wi.gov/topic/ERReview/Review.html>
 - Link to Wetland Mapping Information and the DNR Surface Water Data Viewer
<https://dnr.wi.gov/topic/Wetlands/mapping.html>
 - Link to the Wisconsin State Historical Society Historic Preservation Database
<https://www.wisconsinhistory.org/Records/Article/CS4091>



Questions?



Landfills - delayed
capping, interim
waste grades, etc.



Scope

- What options exist to plan for settlement and maximize use of air space?
- What are the regulatory pathways?
 - Delayed capping
 - Interim waste grades
 - Reclaiming intermediate cover slopes



Delayed capping

- NR 514.07(3) – MSW landfills
 - 1 or more years (2 years typical – settlement)
 - Each phase of closure
- Requirements
 - Intermediate cover soil and seed – portions at final waste grade
 - No additional waste placement
 - Gas system installed and operational



Delayed capping

- What to submit for approval
 - Feasibility – conceptual plan
 - Plan of operation –
 - NR 514.05(5), 514.06(9) & (10)
 - Detailed description of phasing, filling, & closure (proposed delays)
 - Table – liner & final cover sequences, acreage and estimated schedule
 - Phasing plan sheets – construction and closure



Interim waste grades

- Interim waste grades that are higher than final waste grades
 - 5% of total waste depth (typical)
 - Design and operational practice
 - Must request in feasibility report (or feasibility modification)



Interim waste grades

- Feasibility report
 - Proposed % higher
 - Justification (e.g. settlement due to leachate recirculation)
 - Schedule of capping delay
 - Plan sheets
 - Maximum waste grade contours
 - Intermediate waste grade contours



Interim waste grades

- Plan of Operation
 - Maximum interim waste grades plan sheet & table
 - Coordinates, 100-ft grid
 - Elevations – top of drainage layer, final waste grades, interim waste elevations
 - Provisions for removal of waste if does not settle
 - Design calculations consider interim waste grades



Reclaiming intermediate cover slopes

- Exemption request NR 514.07(3)(b)
 - Special cases, NR 500.08(4)
 - E.g. enhanced settlement due to liquids addition
 - Once prior to capping



Reclaiming airspace after closure

- Considered an expansion
- Closure prepares landfill for long term care – phased approach



Questions?

State of Wisconsin



January 2011 Special Session
Assembly Bill 8

Date of enactment: May 23, 2011
Date of publication*: June 7, 2011

2011 WISCONSIN ACT 21





Act 21 Explicit Authority

- § 227.10(2m) – requires explicit authority for agencies to implement or enforce permit terms and conditions.



Permit and Approval Authority

No agency may implement or enforce any standard, requirement, or threshold, including as a term or condition of any license issued by the agency, unless that standard, requirement, or threshold is explicitly required or explicitly permitted by statute or by a rule that has been promulgated in accordance with this subchapter. . . .



Definition of License

. . . all or any part of an agency permit, certificate, approval, registration, charter or similar form of permission required by law. . .

Exceptions: a hunting or fishing approval or a similar license where issuance is merely a ministerial act.



Act 21 AG Opinions

1 OAG 2016 (High Cap Wells)

- No explicit authority to review environmental impacts of high capacity wells, except those wells specifically listed in s. 281.34
- No explicit authority to consider cumulative impacts when approving or denying a high capacity well application



AG Opinions (con't)

4 OAG 2017 (Fire Sprinkler Rule)

- Agencies cannot rely on legislative grant of authorities that are **arguably implicit, such as “general powers or duties.”**
- Cannot enforce Pre-Act 21 rule that is more restrictive than statute.
- Request to modify this opinion is being considered.



Recent Act 21 Litigation

- *Clean Wisconsin v. DNR*

Issue: DNR authority to consider impacts to navigable waters when considering requests for high capacity well approvals (Pending before Supreme Court)



Act 21 CAFO Litigation

Clean Wisconsin et al v. DNR and Kinnard Dairy

Issue: explicit authority to impose an animal unit
“**cap**” and off-site monitoring of landspreading in a
WPDES CAFO permit

*Pleasant Lake Management District v. DNR and
Richfield Dairy*

Issue: explicit authority to impose an animal unit
cap in WPDES CAFO permit



DNR Act 21 Analysis

- DNR Review of Permits and Approvals

Is the condition, standard, requirement, or threshold *explicitly required or explicitly permitted* by statute or by a rule?



Outcomes

- Confirmation of Existing Authority
- Modification of Permit Conditions
- Elimination of Permit Conditions
- Recommendations for Rulemaking
- Recommendations for Statute Change
- Rule and Statute Citations for Permits and Approvals



Best Practices

- Add cites to Statute and Code where applicable – do not rely upon guidance
- When in doubt, consult with your supervisor and/or legal
- **Let legal know about “Act 21” challenges**



Questions?