



November 18, 2019

ecomment@pa.gov

Technical Guidance Coordinator, Policy Office
Pennsylvania Department of Environmental Protection
Rachel Carson State Office Building
P.O. Box 2063
Harrisburg, PA 17105-2063

**RE: Comments on Draft Technical Guidance, Substantial Revision,
“Radioactivity Monitoring at Solid Waste Processing and Disposal Facilities”
DEP ID 250-3100-001**

Dear Technical Guidance Coordinator:

The Pennsylvania Waste Industries Association (PWIA) is the Pennsylvania chapter of the National Waste and Recycling Association, a non-profit organization that represents the interests of the North American waste services industry. PWIA members include both privately held and publicly traded companies that own and operate numerous commercial solid waste disposal facilities throughout the Commonwealth. In addition to solid waste landfills, PWIA members operate resource recovery facilities, transfer stations and collection operations. PWIA’s missions are to promote safe, efficient, environmentally responsible management of solid wastes and to promote sound public policy affecting the management of solid waste in the Commonwealth.

PWIA members have significant experience with the Department’s existing technical guidance on “Radioactivity Monitoring at Solid Waste Processing and Disposal Facilities” and hereby files this letter in support of the comments submitted by Waste Management of Pennsylvania, Inc. and Waste Management Disposal Services of Pennsylvania, Inc, and its network of affiliates operating in Pennsylvania. PWIA respectfully requests that the Department incorporate the recommended changes set forth in that letter and continue to work with the industry to develop scientifically sound, current and practical measures for radioactivity monitoring at solid waste processing and disposal facilities.

PWIA appreciates the opportunity to comment on the Department’s Technical Guidance, Substantial Revision, “Radioactivity Monitoring at Solid Waste Processing and Disposal Facilities.”

Very truly yours,

/s/ Tim O’Donnell

Tim O’Donnell
President