

Received Comments 1-20 ballot

		Credit	Comments	Response
SMMP	Comprehensive Sustainable Materials Mangement Policy and Programs		Concerned about not permitting use of glass "that have established markets for recycling or diversion." Who decides what is an "established market?" What is an established market?	In the context of SWEEP, all conventionally recycled materials by definition prima facia have markets. SWEEP will include some language in the preamble noting that regional and market considerations will be evaluated during the Pilot and potential modifications made as a result of experience. We also have noted in a Footnote that glass markets are highly local & will be evaluated during the Pilot.
SMMP	Comprehensive Sustainable Materials Mangement Policy and Programs		"Recyclable materials used as ADC do not count toward diversion rate regardless of a market being available." So a local government gets no credit for using glass as ADC, even when a state agency has approved it and there is no market for it. We should give some credit (maybe not full credit) for using glass as ADC in such situations.	Not persuasive. SWEEP is a leadership standard that goes beyond minimum legal requirements.
SMMP	Comprehensive Sustainable Materials Mangement Policy and Programs		Comment: Add as Potential Strategy: "Certification in applicable training, such as SWANA's Managing Integrated Solid Waste Management Systems course."	Although "Potential Strategies" are not part of the standard, we agree that it is important to include reference to existing standards in the field.
SMMP	Comprehensive Sustainable Materials Mangement Policy and Programs		Local Government Requirements: Need to define "established markets." For example, glass may have a market in Seattle but not in New Mexico, and it makes no environmental or economic sense to travel beyond 250 miles to market. In New England the only glass plant closed, leaving recyclers with no markets.	In the context of SWEEP, all conventionally recycled materials by definition prima facia have markets. SWEEP has included some language in the preamble noting that regional and market considerations will be evaluated during the Pilot and potential modifications made as a result of experience.
SMMP	Comprehensive Sustainable Materials Mangement Policy and Programs		Industry Requirements SWEEP Text: "Design and adopt corporate environmental goals and programs that cover all of the following elements as applicable to the activities of the company: - Include a clear statement of waste reduction goals." Comment: "Is this a company's goals or the goals as they pertain to the community?"	We have clarified in the standard that these are corporate-level goals, rather than local community or business-unit goals.
SMMP	Comprehensive Sustainable Materials Mangement Policy and Programs		SWEEP Text: "Define requirements for source separation of materials, depending on material management system used" Comment: "Are these the Company's own materials, or services provided to customers? This is confusing since service providers establish programs based on customers' policies. there should be collaborative goals set with customers based on policies and contracts – and then the company should set goals."	We have added "In cooperation with the relevant local government authorities" at the beginning of that sentence.

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SMMP	Comprehensive Sustainable Materials Mangement Lifecycle Analysis and Policy Programs	<p>SWEEP Text: "Develop a plan where the program is designed to produce the highest and best environmental result based on life-cycle thinking principles. The comprehensive plan can be either a Sustainable Materials Management (SMM), Zero Waste, Closed Loop, Circular Economy, or comparable plan."</p> <p>Comment: "This is important since later in the document only Zero Waste is highlighted. We need consistent reference to all of these elements, rather than a single one."</p>	<p>The point is not necessarily to convey equivalence, rather to note that all of these variations are creditable under SWEEP initially. The standard differentiates and rewards at different levels later in the document. We will continue to further define and refine definitions in the standard.</p>
SMMP	Comprehensive Sustainable Materials Mangement Lifecycle Analysis and Policy Programs	<p>SWEEP Text: Conduct material-specific analysis for all material categories identified in the WCS that prioritizes policies and programs that provide the greatest environmental benefit. The analysis should assess environmental elements of the material categories, as well as social and economic elements of the material categories.</p> <p>Comment: These are often conducted by and vary by line of business. Often companies only provide one portion of the service</p>	<p>SWEEP evaluates companies based on what elements of the criteria they are responsible for. If a company handles multiple materials, it should do the evaluation based on those materials. Companies are not responsible for reporting on materials that they do not handle or process.</p> <p>Thus, for example, one company does single stream recycling and another organics, the recycling company does not need to evaluate the organics options and vice versa. However, we expect that different lines of business within the same organization would coordinate to provide the required information.</p>
SMMP	Comprehensive Sustainable Materials Mangement Lifecycle Analysis and Policy Programs	<p>SWEEP Text: Prepare a comprehensive waste characterization study (WCS) for materials handled within the Company's service area following the requirements of SMMP Credit 4: Regular Waste Characterization and Source Reduction Programs.</p> <p>Comments: <u>Industry Requirements</u>: These should be goals, not strategic plans What is the definition of "regular"? Waste companies don't conduct waste characterization studies, but their customers do What is the "service area". A service area could cover multiple jurisdictions with varying goals and programs. Waste/Recycling service providers are contracted to provide the services requested by our customers with little control over the plan itself.</p>	<p>We are looking at this as a "both/and". Although we are not rewarding performance in this section of the standard, we are requiring that the goals have an execution plan behind them.</p> <p>"Regular" is defined as 7 years right now for a full WCS study, unless there is significant change in composition detected in the interim partial evaluations. We will continue to evaluate these requirements during the Pilot.</p> <p>These are corporate level goals. In the Industry requirements, we have changed "Prepare" to "Support the development of and/or utilize" Issue of residuals for MRF audits. [Technology evolution with optical sorters and real-time management of bins, etc. will change this.</p> <p>For policy context, it just needs to be "SWEEP acceptable" vs. hewing to the various requirements of multiple jurisdictions. As a practical matter, we would recommend hewing to either the most stringent of requirements of the jurisdictions served or SWEEP requirements, whichever is more stringent.</p>
SMMP	Comprehensive Sustainable Materials Mangement Lifecycle Analysis and Policy Programs	<p>SWEEP Text: Consider Zero Waste plans as the most environmentally, socially and economically beneficial option. Conduct a hypothetical analysis to show the benefits of the plan.</p> <p>Comment: Include all frameworks (SMM, Zero Waste, Circular Economy, Closed Loop)</p>	<p>We have added a footnote recognizing SMM as the principal framework for the SWEEP+ Standard and list other options.</p>

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SMMP	Adoption of Diversion and Recycling Goals	Comment: What is the national average C&D recycling rate? How can we have a standard that provides points to entities exceeding a benchmark if the benchmark is not identified?	<p>SWEEP has estimated a C&D recycling benchmark based on C&D generation from the EPA's 2017 Sustainable Materials Management report and the CDRA recycling report from 2017. Further clarification will be presented in the Certification Manual.</p> <p>For the purposes of the Pilot, we will be considering asphalt as part of the recover requirements for Local Governments, but optional for Industry, depending on whether the company processes it.</p>
SMMP	Adoption of Diversion and Recycling Goals	Comment: Tier 3: why is there no 10% maximum residue limit, when such a limit is provided under the Alternative Compliance Path and for businesses on page 33 Tier 3?	Defining a "Residue" limit does not make sense in a Zero Waste context. This is a stretch goal. The reference to residue has been removed from the Tier 3 Industry requirement.
SMMP	Adoption of Diversion and Recycling Goals	Comment: Why does "Alternate Compliance Path Plan/Policy" re-set annually as state diversion rates are updated, but not the regular compliance plan tied to federal data does not?	We have updated the language to include federal data in the benchmark reset: "Note: The Plan/Policy must be updated when federal average diversion rates are made available."
SMMP	Adoption of Diversion and Recycling Goals	<p>Comments: The industry requirements use the EPA recycling rate of 34.7% as the benchmark, but this includes both recycling and composting. Many commercial establishments do not generate organic material that can be composted, and therefore using the 34.7% rate is problematic. When composting is excluded from the calculation, the recycling rate is under 30%.</p> <p>Why doesn't Tier 2 reference state averages, when they are referenced in Tier 1 and Tier 3?</p>	<p>One of the purposes of the Pilot is to identify potential issues with the criteria. You have identified the combined diversion number as a potential problem and we will keep this in mind. What we have seen from the numbers so far is that commercial recycling rates are actually significantly higher than residential rates, so it should not necessarily be an issue.</p> <p>The Tier 2 reference to the National Average Recycling rate was in error and has been corrected.</p> <p>The other important thing to note is that the policy section is focused on the intent and not the execution.</p>
SMMP	Adoption of Diversion and Recycling Goals	Comment: Definitions of key terms would be helpful	We identify Defined Terms through capitalization in the standard. The Certification Manual contains the glossary of Defined Terms pertinent to each credit. Through the technical committees, we will be further refining and defining terms during the Pilot.
SMMP	Adoption of Diversion and Recycling Goals	Comment: Do the Industry requirements apply to the entire corporation of the entity applying for SWEEP certification?	This is corporate-wide strategy, independent of the requirements of the customer.
SMMP	Adoption of Diversion and Recycling Goals	Concerned about including C&D in this document. Would a company be evaluated for C&D facilities if we have them in a market, whereas those who don't would not be? C&D is a very separate process.	These are goals, so performance will be evaluated separately. We may define C&D differently for Industry than for Local Government with regard to asphalt. We will also clarify what the national C&D recycling rate is.
SMMP	Adoption of Diversion and Recycling Goals	Comment: Residue from C&D facilities runs much higher than SS MRFs due to the "demolition" part of the equation. Our average is 25%-40%	We will consider separate residue rates for MSW and C&D based on field results from the pilot. Based on our research, some C&D facilities have very low residual rates, e.g. in TX some are in the 10-20% range—lower than for MSW. As a leadership standard, we will set the bar to represent the best performance in the market.
SMMP	Adoption of Diversion and Recycling Goals	Comment: Include all frameworks (SMM, Zero Waste, Circular Economy, Closed Loop)	For this particular credit, Zero Waste is intended to be the stretch goal.

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SMMP	Solid Waste Greenhouse Gas and Air Emissions Footprint Reduction Policy	Comment: Why is 2015 the baseline? What is the reason that year was selected? If SWEEP takes effect in 2020, five years will have transpired between the baseline year and the effective date.	Emissions reductions targets routinely are benchmarked against earlier dates. The goal was to not penalize jurisdictions and companies that had started their activities earlier on.
WGP	Measuring and Calculating Waste Generation, Recovery and Disposal	Comment: Companies can only do this for their own material, not competitors volumes. C&D and recyclable materials, and often commercial/industrial waste are collected by multiple companies.	The company is only responsible for measuring or estimating waste generation for their own customers.
WGP	Measuring and Calculating Waste Generation, Recovery and Disposal	SWEEP Text: Company's service area Comment: Implies geographic area, not material a company controls	Potential Strategies is not part of the core requirements. However, we will clarify that this applies to materials handled by the company within the boundaries of the relevant jurisdictions. There is a wider geographical component as well if the company wants its certified performance to apply to multiple jurisdictions, which is allowable.
WGP	Measuring and Calculating Waste Generation, Recovery and Disposal	SWEEP Text: "Encourage or require solid waste haulers (i.e., service providers of waste collection) to conduct studies of collected materials by sector on a regular basis." Comments: Define regular Cities hire consultants to do this.	Potential Strategies is not part of the core requirements. However, we will clarify a support role vs. a responsibility role. Companies could also fund these companies if they are looking for the point. It will be a business decision to decide whether to address or not. SWEEP strives to build a more collaborative framework between local governments and waste service providers. "Regular" is defined 7 years for full WCS and 3-4 years for updates as per the SMMP Regular WCS policy credit.
WGP	MSW Source Reduction Programs	SWEEP Text: Implement a waste prevention program for MSW, including, as appropriate, C&D wastes and biosolids Comment: Biosolids is not part of MSW stream. How did it work its way into this document?	We originally intended for biosolids to be included, but we have not done the necessary preparation. For the Pilot Program we have removed biosolids, but integrate them in future versions of the standard.
WGP	MSW Source Reduction Programs	SWEEP Text: "Rate structure modifications (Pay-as-you-throw programs in the residential sector and/or fee adjustments to nonresidential sector rates)" Comment: Interesting that PAYT is in the waste reduction area. Probably not the correct place for it.	PAYT has been shown to reduce waste generation. In NH, reductions up to 50% were seen: https://www.greenmatters.com/news/2018/11/14/ZtwPtJ/pay-as-you-throw-trash-program
WGP	Litter Prevention and Reduction Infrastructure	SWEEP Text: "Consistent and reliable servicing of receptacles. A schedule is in place to appropriately empty receptacles nearing capacity. Limit overflow events to zero (0) per year." Comment: Who will track? Is this viable?	There are lots of emerging "smart bin" tracking tools (e.g. Compology) available out there to monitor and track litter bins capacity and overflow .

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WGP	Sustainable Capital and Utility Procurement	Comment: Add waste or biomass to Tier 1 industry list of eligible on-site renewables.	These are already addressed in the credit. We may, in fact, need to reconsider the biomass portion, depending on the source of biomass.
WGP	Sustainable Capital and Utility Procurement	<p>SWEEP Text: "Tier 1 Requirement: Offset 100 percent of the Scope 1 & Scope 2 carbon emissions through Carbon Offsets and/or Renewable Energy Credits (RECs) or equivalent. RECs purchased from the grid must be Green-e-Energy certified or equivalent from sources that have come online in the last 10 years For remaining Scope 1 emissions or for all Scope 1 & Scope 2 carbon emissions, purchase carbon offsets that are Green-e-Climate certified or equivalent"</p> <p>Comment (Same comment made for both Government and Industry): Suggestion: Add: "Or document avoided emissions benefits associated with recycling services provided."</p>	This credit is intended to focus on internal operations. The environmental benefits and incentives to recycle are well represented in other parts of the standard.
WGP	Sustainable Capital and Utility Procurement	<p>SWEEP Text: "Certify all construction or renovation projects of waste processing facilities in excess of 5,000 square feet to LEED certification version 3 and above, or equivalent. SWEEP will review all equivalent certification and renovation projects."</p> <p>WM Comment: Add "or equivalent"</p>	We have added equivalency language. We also credit several forms of LEED certification
SWC	Alternative Collection Options for Recyclable and Compostable Products and Materials	<p>SWEEP Text: Potential Strategies: Identify the number of residents or customers covered by operating curbside programs. Site and support drop-off facilities in convenient locations. Adopt standardized color-coding of private and public carts and bins"</p> <p>Comment: Make this more generic to suggest adding clear labeling and decals</p>	<p>Potential Strategies are not part of the core requirements.</p> <p>We have made consistent color coding and identification the basic requirement.</p>
SWC	Alternative Fueled Solid Waste Collection Vehicles	<p>Comments: Tier 1: Remove "waste derived or other" and "or 60 percent or more from low-carbon intensity fuels". Replace "alternative" with "renewable". Tier 2: Remove "waste derived or other" and "or 95 percent or more from low-carbon intensity fuels". Replace "alternative" with "renewable". Add: "Renewable energy includes" Replace "hydro" with "geothermal". Remove "count 2x. Fuels dry organic waste feedstock count 1.5X" Add "Fuels derived from waste disposal facilities, such as biomass incinerators, waste-to-energy facilities, plastic-to-fuel plants, and landfills are not considered renewable."</p>	We have further defined Renewable, Alternative and Low-Carbon within the standard to be consistent with EPA definitions, plus some further clarification. We will test, and improve if needed, these definitions during the Pilot.
SWC	Solid Waste Collection Cost Transparency	<p>SWEEP Text: Calculate the cost per ton of collecting and transporting discarded materials, including mixed waste, recycling and organic material, from the Local Government jurisdiction or Company's service area.</p> <p>Comment: This is a place where combining the govt and industry requirements may be problematic. Companies cannot/will not provide their cost information in a competitive environment.</p>	SWEEP is only seeking top-level information that would not put any respondent at a competitive disadvantage and many jurisdictions already post the type of pricing info that we are looking for. In addition, as a credit, response by companies is purely voluntary and not necessary for SWEEP Certification.

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SWC	Commitment to Safe Working Conditions	The "Intent" paragraph refers to "collection" but the first requirement refers to "each disposal site." Many local governments and haulers dispose of waste & recyclables at 3rd party disposal facilities. How are they supposed to "increase operational regulation, safety resources and safety awareness" at facilities they don't own? What does "operational regulation" even mean?	This was a typographical error that has been corrected.
SWC	Commitment to Safe Working Conditions	The requirement to provide a 30 minute break to drivers after 5 hours may be inconsistent with labor union agreements. Providing a break does not make drivers safer. Making sure that drivers comply with applicable HOS requirements does (among other things)	<p>We have modified the requirement to allow for more flexibility for when the break is taken.</p> <p>HOS is a minimum requirement and not an indication of leading practice, so SWEEP is free to establish requirements that do not conflict and go beyond.</p> <p>There will be instances where SWEEP criteria are not consistent with existing policies and activities. It is up to the jurisdictions and companies to decide if modifying their practices is worth achieving the credit in SWEEP. If these modifications are deemed not feasible for whatever reason, then there are many other credits and points that can be pursued for SWEEP certification.</p>
SWC	Commitment to Safe Working Conditions	Need to delete the "under no circumstances can the results" language. If the Safety Committee observes a worker doing something illegal or that places himself or another person in danger, the employer has a right to take action, including termination.	SWEEP has modified the credit language to reflect these concerns.
SWC	Commitment to Safe Working Conditions	The requirement to provide ACA qualified insurance is a new requirement that implicates employee benefits. This is beyond the appropriate scope of SWEEP and should be deleted.	SWEEP has modified the credit language to reflect these and other concerns. As with all credits if entities seeking certification find the requirements infeasible, there are many other options to gain the points necessary for certification.
SWC	Commitment to Safe Working Conditions	The requirement that employees (not workers) are paid a living wage is a new requirement that implicates employee benefits. This is beyond the scope of SWEEP and should be deleted. The MIT Living Wage calculator states the "Living Wage" for 1 adult with 2 children is \$41.54 in New York County and Queens County. This is substantially above the current average wage for solid waste collection workers in New York City, and the current hourly rates set forth in local union contracts.	SWEEP has further defined Living Wage and Minimum Wage in the standard. We will provide additional guidance in the Compliance Manual to clarify how to determine these parameters. If field experience proves any of these criteria to be infeasible we will modify the credit accordingly.
SWC	OSHA Compliant Practices and Safe Vehicle Processes	Proper and regular maintenance should be included in language. One of the most important ways to prevent accidents is to do a good job maintaining the truck, require pre-trip inspections, etc.	SWEEP has modified the credit accordingly.
SWC	OSHA Compliant Practices and Safe Vehicle Processes	For truck-related stuff, FMCSA, not OSHA, is the appropriate regulatory authority, and should probably be referenced.	SWEEP has modified the credit accordingly.

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SWC	OSHA Compliant Practices and Safe Vehicle Processes	Add to requirements: "Provide drug and alcohol testing consistent with applicable standards."	SWEEP has modified the credit accordingly.
SWC	OSHA Compliant Practices and Safe Vehicle Processes	The exception created that begins with "No employee driver shall be discharged..." should be deleted. It creates the very strong likelihood that different "employee led safety committees" will establish different benchmarks for determining whether the same behavior at different employers constitutes "dishonesty" or "extreme disregard for the law or safety practices." If an employer discovers that an employee is engaged in unsafe behaviors that threatens personal injury or property damages, the employer should have the right to take action, including termination. SWEEP should encourage the use of telematics and other technologies that have been proven to reduce accidents and unsafe driver behaviors, not protect unsafe employees.	SWEEP has reviewed the language in light of these concerns and made modifications that address most of them: "oNo employee driver shall be discharged if such discharge is based solely upon information received from GPS, telematics, or any successor system that similarly tracks or surveils a driver's movements unless, he/she engages in dishonesty (any intentional act or omission by an employee where he/she intends to defraud the Company) or extreme disregard for the law or safety practices, as set by the employee led safety committees."
SWC		Should allow for technology advances to play a role.	See response regarding role & use of telematics.
PCR	Maximum Diversion Rate	SWEEP Text: "Demonstrate that at least 30% of the MSW, including C&D, that is controlled by the Company is diverted from disposal." Comments: This potentially penalizes companies with C&D facilities. What if another company doesn't have a C&D facilities in the area so they might be rated more favorably than a company with one. C&D rating needs to be completely separate.	Statistics from CDRA* indicate that national recycling rates for the C&D materials are as follows: -Bulk Aggregate (Mostly Concrete): 85% -Mixed C&D (wood, metal, gypsum, etc.) 38% -Recycled Asphalt Pavement: 99% On this basis, the indication is that having C&D in the calculation would actually help a company, rather than put it at a disadvantage. SWEEP believes that 30% minimum diversion requirement is reasonable. * Benefits Of Construction And Demolition Debris Recycling In The United States (2017)
PCR	Clean and Efficient Material Recovery and Organics Processing Facilities	SWEEP Text: "Is Energy Star Certified or implements energy conservation best practices that result in a 25 percent savings in energy consumption (over a LEED compliant baseline, or equivalent)." Comment: Add "or equivalent"	SWEEP has implemented this suggestion.
PCR	Compact Commodity/Output Supply Chain	Comment: The use of miles, in isolation, is an inadequate way to measure a reduced environmental footprint. Shipping by rail or barge has lower GHG emissions on a per mile/per ton basis than trucks. In addition, what is the basis for 2,000, 500 or 100 miles as appropriate measures? This entire section should be deleted.	SWEEP has developed a "carbon budget" per ton-mile calculator that factors in the carbon intensity of different material transport modes that we will be testing and refining during the Pilot.
PCR	Alternative Fueled Onsite Mobile Equipment	Comments: Remove "or low-emission" Replace "Low-emission fuels" with "Renewable energy includes", replace "hydro" with "geothermal", Remove "count 2X. Fuels dry organic waste feedstock count 1.5X" Add "Fuels derived from waste disposal facilities, such as biomass incinerators, waste-to-energy facilities, plastic-to-fuel plants, and landfills are not considered renewable."	We have further defined Renewable, Alternative and Low-Carbon within the standard to be consistent with EPA definitions, plus some further clarification. We will test, and improve if needed, these definitions during the Pilot.

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PCR	Good Neighbor Practices	Comments: Litter recovery within 1 mile of a facility in rural areas? On all sides? That's a pretty big area that would require litter recovery (several square miles).	<p>SWEEP has modified these requirements to reflect different densities of development.</p> <p>"oUrban: within 100 yards of the facility's boundary and at least ¼ mile along primary access routes. oSub-urban: within 100 yards of the facility's boundary and at least 1 mile along primary access routes. oRural: within 100 yards of the facility boundary and at least 2 miles along primary access routes."</p> <p>We will seek feedback on their feasibility during the Pilot.</p>
PCR	Good Neighbor Practices	The requirement that no new facility be built within 900 feet of certain other land uses would supersede all local government land use planning authority. The use of the phrase "or other places people live or congregate" is vague and ambiguous. SWANA agrees that waste facilities should be good neighbors. Compliance with applicable local, state and federal laws should be what is required, with deductions for NOVs from applicable agencies. Finally, odor and noise are not mentioned, and these are often two of the leading impacts of waste facilities on neighboring or nearby properties.	<p>SWEEP has modified the buffer zone requirements to reflect different densities of development. We will seek feedback on their feasibility during the Pilot.</p> <p>Odor and noise issues are mentioned in each of the tiers.</p>
PCR		<p>SWEEP Text: Tier 1: (1 point) Achieve 1 Credit from PCR 6,7 or 8 and No unresolved complaints or violations within the last year;</p> <p>Comment: How to you evaluate unresolved? Some neighbors will never agree that issues are resolved. Formal complaints?</p>	<p>Complaints must be submitted through official channels. Resolution will be determined by the relevant state authority. We have added this clarification to the Requirement and we will expand upon it in the Certification Manual.</p>
PCR	Post-Collection Recovery Facility Safety Protocols and Training	Same concerns re ACA and Living Wage noted previously.	See SWEEP's previous responses regarding ACA and Living Wages
PCR	Post-Collection Recovery Facility Safety Protocols and Training	Weekly training is too frequent. Replace with quarterly.	SWEEP has modified the requirement to weekly training for new hires for at least a quarter, plus monthly training for longer-term employees.
PCD	General	PCD Efficiency and Effectiveness KPI is blank.	This is intentional for the time being until we can craft an appropriate credit.
PCD	Post-Collection Disposal Facility Safety Protocols and Training	Under Tier 2, weekly training is too frequent. Replace with quarterly. Also, the 2 requirements should be divided by the word "or".	SWEEP has modified the requirement to weekly training for new hires for at least a quarter, plus monthly training for longer-term employees.

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PCD	Post-Collection Disposal Facility Safety Protocols and Training	<p>Many employees work at employers that are non-unionized, and as written, it would be impossible for employers with such facilities to qualify for Tier 2. Indeed, it would be preferable if the second requirement was deleted entirely, as SWANA has concerns about a collective bargaining representative being given the authority under SWEEP to "recognize" the adequacy of an employer's safety training.</p>	<p>SWEEP has added an 'Alternative Compliance Path' for non-union shops:</p> <ul style="list-style-type: none"> •Provide "Advanced operational training" covering fixed and onsite mobile equipment <ul style="list-style-type: none"> oTraining should include both "classroom" and "field" components oFor training on existing equipment or improved existing equipment, Trainers should have a minimum of 2 years of full time operating experience on the equipment that is the subject of the training and demonstrated training experience of 100 hours, or equivalent certification. oFor newly introduced equipment (e.g. robotics), Trainers should have a minimum of 6 months of field or laboratory operating experience on the equipment that is the subject of the training and demonstrated training experience of 100 hours, or equivalent certification. "
PCD	Post-Collection Disposal Facility Safety Protocols and Training	<p>Replace "the relevant SWANA equipment" with "applicable." Add as bullet 1 --comply with applicable ANSI Z245 requirements</p>	<p>This change has been implemented.</p>
PCD	Good Neighbor Practices	<p>Note that noise and odor are identified here but were not identified above.</p>	<p>Odors and noise are identified under each of the tiers.</p>
PCD	Good Neighbor Practices	<p>Same concern about recovering litter within 1 mile of a rural location as in previous good neighbor credit.</p>	<p>SWEEP has modified these requirements to reflect different densities of development.</p> <ul style="list-style-type: none"> oUrban: within 100 yards of the facility's boundary and at least ¼ mile along primary access routes. oSub-urban: within 100 yards of the facility's boundary and at least 1 mile along primary access routes. oRural: within 100 yards of the facility boundary and at least 2 miles along primary access routes." <p>We will seek feedback on their feasibility during the Pilot.</p>