

Eiken, Tim

From: Reppond, Mark E <Mark.Reppond@safety-kleen.com>
Sent: Tuesday, May 26, 2015 3:13 PM
To: Eiken, Tim
Cc: Sorenson, Mori
Subject: Comment to Proposed Rule

To: Mr. Tim Eiken, MDNR, Hazardous Waste Program, Rules Coordinator:
Re: Comment to Proposed Rule
Vol. 40, No. 10, Missouri Register 2015-05-15 pp. 665-666
PUBLICATION DATE: 05/15/2015
ACTION DATE: 04/15/2015
COMMENT DEADLINE: 06/25/2015
PUBLICATION TYPE: Register

Dear Mr. Eiken,

Pursuant to the public notice to submit written comments prior to June 25, 2015, Safety-Kleen wishes to comment on the above-mentioned regulation. The follow comment applies only to the above-mentioned proposed rule:

In reviewing the proposed rule change, it was noted that the Dept. omitted a change discussed and agreed upon during the stake holder meetings. This change would have removed the Missouri-specific requirement under 10 CSR 25-11.279 requiring all used oil shipments to be recorded on a state form (the Missouri Transporter's Used Oil Shipment Record). This form is a duplication of effort in that there is an equivalent Federal Regulation. The Missouri Specific form is not recognized by states other than Missouri, therefore, when shipping used oil in or out of state, it is common for two separate shipping papers to be prepared for each shipment. This costs transporters not only for the form, but administrative time preparing two separate shipping papers for each shipment. The form is not needed in order to comply with other parts of the regulation (completion of the Transport's used oil annual report) as this information is readily available no matter the shipping paper utilized. Because the entire rule package proposed is in keeping with the "no stricter than" law, and discussion on this change occurred during the stakeholder process, the removal of this requirement should be included with the rule package being proposed. I have included the text of the regulation below:

A. The information described in 40 CFR 279.46(a)-(c), incorporated by reference in this rule, shall be recorded on form MO 780-1449(11-93), the Transporter's Used Oil Shipment Record, incorporated by reference in this rule and provided by the department;

Sincerely,

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