

## Eiken, Tim

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**From:** Evan Bryant <ebryant30@gmail.com>  
**Sent:** Sunday, June 14, 2015 10:44 AM  
**To:** Eiken, Tim  
**Cc:** Eby, Nicole; Bryant, Evan  
**Subject:** Public Comment

As a private citizen I have chosen to exercise my rights and publicly submit comments during this open comment period.

Per the proposed amendments to Title 10, Division 25, Chapter 5 on page 634 of the Missouri Register, I strongly disagree with the amendment to have a dual regulations allowance for Satellite Accumulation. In the past, just having regulations differing from the federal regulations was confusing to many especially businesses from out of state and generators with a limited working knowledge of the regulations.

Having two separate sets of regulations within Missouri's regulations will add to the confusion making comprehension and compliance more difficult for all but the largest generators.

A solution to clarify which set of satellite accumulation rules a generator will use has been included in these proposed rules. A requirement for generators to register as to which satellite accumulation rules they will use at their facility. This will give generators the ability to claim that they are not violating satellite accumulation rules just simply that they registered inappropriately and that it's only a "paperwork violations". This has the potential to make compliance with two separate systems for the same activity difficult for the regulated community and the regulators.

In aligning with the federal regulations, in the spirit of the "no stricter than" legislation, and to facilitate as easy a shift to new satellite accumulation regulations I would encourage the Hazardous Waste Commission to simply adopt the straight federal regulations as Missouri's only satellite accumulation regulation. This will make it simpler and easier on regulatory staff (both federal and state) as well as interstate businesses and the regulated community which would all then have the same regulations as the rest of the country.

Thank You.

Evan Bryant  
Jefferson City, MO  
*sent from St. Louis, MO*  
Sunday June 14, 2015