



Hazardous Waste Program Fee Stakeholder Workgroup Frequently Asked Questions

What are some of the proposed changes to the fee structure that are being considered?

At this point in the process, the department has not developed recommendations for changes to the hazardous waste fee structure. The purpose of the first meeting was to provide information about the department budget and the program budget, and about the revenues, expenditures, fees, and funding sources for Hazardous Waste Program activities. Proposals will be developed through the workgroup process.

Has the department taken any specific actions to try to locate hazardous waste generators who are “flying under the radar” and are therefore avoiding any fees for hazardous waste generators or hazardous waste generated?

We devote as much time as possible to these “under the radar” type facilities and consider them one of our higher priorities. Not only are they a potential source of “avoided” fees but also tend to have higher potential to mismanage wastes and cause harm to human health and the environment. While we are required by EPA to meet minimum requirements for certain types of inspections (i.e. LQGs) we attempt to address the facilities that have an unknown status in several ways and are continually seeking ways to improve our ability to focus our limited resources on those facilities most likely to have issues.

- Every year we follow through with enforcement action on those known generators that fail to pay fees.
- When developing work plans for the inspectors each year we pull lists of facilities with an unknown or questionable status and utilize this in forming our inspection lists for the year. This allows for identification of facilities that are generating hazardous waste but not accurately reporting it or paying fees and/or confirms closure of facilities and cleanup of our databases so we don't waste time and resources attempting to inspect out of business facilities in the future.
- We investigate each concern received by the public as an inspection and regard each source of concern as a potential generator of hazardous waste. Citizen concerns are a valuable source of information when it comes to identifying generators who have previously been truly “under the radar.”

- We follow through with inspections when we find that a large amount of waste has been shipped from a facility that doesn't appear to be registered at the appropriate level.
- We continue to use information received through sources such as DERT reporting, manifests and generator reports to better identify facilities that may be improperly storing, disposing or generating hazardous waste to better focus our resources on those facilities.

The current fee structure is \$2 per ton for waste from generators outside Missouri who send their waste to Missouri and \$5 per ton for waste from generators located in Missouri. Why is the fee different for in-state generators versus out-of-state generators?

The fee is lower for waste from out-of-state generators because, during the development of the legislation that created the current fee structure, Missouri facilities receiving waste from generators located outside Missouri indicated that other states had lower fees and that, as a result, Missouri's facilities were at a competitive disadvantage to facilities located in other states.

How do other state fees for hazardous waste compare to Missouri's fees?

Department staff have compiled some information on fees in other states and will present this information to stakeholders at the upcoming stakeholder meeting on December 18.

What assumptions did the department use in preparing the charts and graphs presented at the first stakeholder meeting, and could the department provide a list of those assumptions to stakeholders?

Department staff prepared an additional slide to the Power Point presentation that was presented at the November meeting. The presentation is available on the [Hazardous Waste Fee Stakeholder Workgroup](#) webpage. The slide lists the assumptions used by department staff.

In the Financial Overview pie charts presented on November 14, 2014, the chart labeling included letters in parentheses, such as (A) or (C2). What do the letters mean?

The lettering in the pie chart labels are intended as a guide to information related to the fund sources. Additional information about these fund sources is available in a document titled "Fund Source Descriptions", which has been posted to the [Hazardous](#)

[Waste Fee Stakeholder Workgroup](#) webpage. The letter for each “slice of pie” has at least one matching fund source description. For example, General Revenue in each pie chart is labeled “(A)” and a description of General Revenue is presented on slide “(A)” in the fund source descriptions document. Please note that the Hazardous Waste Fund has a primary label of “C” with numeric subscript labeling for more specific revenue streams (C1, C2, etc.).