

Missouri Hazardous Waste Regulation Discussion List

May 10, 2007

1. Presenter: Tom Judge
One-year time limit on satellite accumulation and accumulation start date on containers in satellite areas. (Item 1 on Attachment 1)
2. Presenter: Keith Bertels
100 kg non-acute hazardous waste accumulation threshold between conditionally exempt small quantity generators (CESQG) and small quantity generators (SQG).
(Item 4 on Attachment 1)
3. Presenter: Patty Chapman
Missouri requires that generators package, mark and label during the entire time hazardous waste is accumulated on-site. (Item 9 on Attachment 1)
4. Presenter: Darleen Groner and Gale Carlson
An owner/operator must submit a “health profile,” as required by 260.395.7(5) as part of the application for a hazardous waste treatment or disposal facility.
(Item 13 on Attachment 1)
5. Missouri-specific manifest requirements and need to change considering the federal uniform manifest rule. (Item 2 on Attachment 1)
6. Containment requirements for storage of waste containers in generator storage areas and transfer stations. Lesser requirements if no free liquids or <1,000 kg non-acute hazardous waste. (Item 3 on Attachment 1)
7. Quarterly manifest summary reports for large quantity generators.
(Item 5 on Attachment 1)
8. Hazardous waste treatment, storage or disposal (TSD) facility operator must unload hazardous waste from an incoming railcar within 72 hours of receipt of shipment.
(Item 6 on Attachment 1)
9. Design and storage requirements for TSD storage of containers holding ignitable or reactive wastes. (Item 7 on Attachment 1)
10. Generators and transfer station operators shall “provide safety equipment such as fire blankets, gas masks and self-contained breathing apparatus.” (Item 8 on Attachment 1)

11. *Missouri policy, enforced through inspection, requires that excess waste be removed within 24 hours. (Item 10 on Attachment 1)
12. ***Missouri treats commercial and non-commercial TSDs differently and does not allow commercial TSDs the option of using all six financial assurance mechanisms.* (Item 11 on Attachment 1)
13. Before a TSD permit can be transferred, Missouri requires that the proposed new owner or operator meet a “habitual violator test.” (Item 12 on Attachment 1)
14. ***MDNR modifies requirements for letters of credit indicating that such letter shall be issued by a state- or federally-chartered and regulated bank or trust association. However, if the issuing institution is not located in Missouri, then a bank or trust association located in Missouri shall confirm the letter of credit and the confirmation and the letter of credit shall be filed with the department.* (Item 14 on Attachment 1)
15. **Missouri does not include Subpart N of Part 266. Conditional Exemption for Low-Level Mixed Waste Storage and Disposal.* (Item 15 of Attachment 1)
16. Resource Recovery (New item)

*Action complete.

**DNR proposes delaying action pending national level decisions on these issues.