



MISSOURI
DEPARTMENT OF
NATURAL RESOURCES

DRAFT

NOTICE OF OPEN MEETING

The meeting will also be streamed live from the Department's website at:
dnr.mo.gov/videos/live.htm

**DEPARTMENT OF NATURAL RESOURCES
HAZARDOUS WASTE PROGRAM
HAZARDOUS WASTE MANAGEMENT COMMISSION
AGENDA**

April 21, 2016

**Department of Natural Resources, Hazardous Waste Program
Bennett Springs/Roaring River Conference Rooms
1730 E. Elm Street
Jefferson City, MO 65102**

Note: Persons with disabilities requiring special services or accommodations to attend the meeting can make arrangements by calling the commission assistant at (573) 751-2747 or writing to the Hazardous Waste Program, P.O. Box 176, Jefferson City, MO 65102. Hearing impaired persons may contact the Hazardous Waste Program through Relay Missouri at 1-800-735-2966.

9:45 A.M. EXECUTIVE (CLOSED) SESSION

In accordance with Section 610.022 RSMo, this portion of the meeting may be closed by an affirmative vote of the Commission to discuss legal matters, causes of action or litigation as provided by Subsection 610.021(1). RSMo.

10:00 A.M. GENERAL (OPEN) SESSION

The General (Open) Session will begin promptly at 10:00 a.m., unless an Executive (Closed) Session has been requested; after which, the General Session will start as specified by the Commission's chairman.

Commissioner Roll Call

1. Pledge of Allegiance – Commissioners
2. Approval of Minutes – General (Open) Session, February 18, 2016 – Commissioners

Action Items

3. Certification of HWP Staff Director – Commissioners
4. Officer Elections – Commissioners

Information Only:

5. Rulemaking Update – Tim Eiken, Director’s Office, HWP
6. Legislative Update – Tim Eiken, Director’s Office, HWP
7. Operator Training – Heather Peters, Compliance and Enforcement, HWP
8. Tanks Backlog Plan Update – Ken Koon, Tanks Section, HWP
9. RCRA STAG Funding – Rich Nussbaum, Permits Section, HWP
10. Quarterly Report – Amy Feeler, Public Information, HWP
11. Legal Update – Brook McCarrick, Office of the Attorney General
12. Public Inquiries or Issues – Steve Sturgess, Director, HWP
13. Other Business – Steve Sturgess, Director, HWP
14. Future Meetings
Thursday, June 16, 2016 – to be held at the Bennett Springs/Roaring River
Conference Rooms, 1730 E. Elm Street Conference Center, Jefferson City, MO

Adjournment

**MISSOURI DEPARTMENT OF NATURAL RESOURCES
HAZARDOUS WASTE MANAGEMENT COMMISSION**

Meeting Date: April 21, 2016

ROLL CALL ROSTER

	In Person:	By Phone:	Absent
Chairman Charles Adams	_____	_____	_____
Vice-Chairman Elizabeth Aull	_____	_____	_____
Commissioner Jamie Frakes	_____	_____	_____
Commissioner Michael Foresman	_____	_____	_____
Commissioner Andrew Bracker	_____	_____	_____
Commissioner Mark Jordan	_____	_____	_____

Missouri Hazardous Waste Management Commission Meeting

**April 21, 2016
Agenda Item # 1**

Pledge of Allegiance

Missouri Hazardous Waste Management Commission Meeting

**April 21, 2016
Agenda Item # 2**

Approval of Minutes

Issue:

Commission to review the General Session minutes from the February 18, 2016, Hazardous Waste Management Commission meeting.

Recommended Action:

Commission to approve the General Session minutes from the February 18, 2016, Hazardous Waste Management Commission meeting.

GENERAL

SESSION

MEETING

MINUTES

GENERAL SESSION
HAZARDOUS WASTE MANAGEMENT COMMISSION
February 18, 2016; 10:00 A.M.
1730 E. Elm Street
Bennett Springs/Roaring River Conference Rooms
Jefferson City, MO 65102

(Note: *The minutes taken at Hazardous Waste Management Commission proceedings are just that, minutes, and are not verbatim records of the meeting. Consequently, the minutes are not intended to be and are not a word-for-word transcription.*)

The meeting was streamed live from the Department's website at: dnr.mo.gov/videos/live.htm.

COMMISSIONERS PRESENT IN PERSON

Chairman Charles Adams
Vice Chairman Elizabeth Aull
Commissioner Mark Jordan

COMMISSIONERS PRESENT BY PHONE

Commissioner Andrew Bracker
Commissioner Michael Foresman

Chairman Adams called the General Session to order at approximately 10:01 a.m.

A roll call was taken of the Commissioners. Chairman Charles Adams, Vice Chairman Elizabeth Aull, and Commissioner Mark Jordan were present in person. Vice Chairman Bracker and Commissioner Foresman were present by phone.

1. PLEDGE OF ALLEGIANCE

Vice Chairman Aull led the recitation of the Pledge of Allegiance by the Hazardous Waste Management Commission (Commission) and guests.

2. APPROVAL OF MINUTES

- General Session minutes from the October 15, 2015, meeting:

Vice Chairman Aull made a motion to approve the October 15, 2015, General Session minutes. Commissioner Jordan seconded the motion.

A vote was taken; all were in favor, none opposed. Motion carried. Minutes were approved.

3. INTRODUCTION OF THE NEW COMMISSION COUNSEL – BROOK MCCARRICK

Mr. David J. Lamb, Director, Hazardous Waste Program, addressed the Commission and began an introduction of the new Commission Counsel, Ms. Brook McCarrick. He noted that Ms. McCarrick would be replacing Ms. Kara Valentine, who had left her position with the Attorney General's (AG) Office and was now working for the state of Nebraska as the Deputy Department Director with the Department of Environmental Quality. He advised that Ms. Valentine had been directly involved in many high-priority projects during her time with the AG's office and that she had had over 20 years of experience working directly with hazardous waste issues; so, obviously she was going to be missed at the AG's office and here at the Department. But, he noted, while she will be missed we certainly are happy for her to have the opportunity she's having in Nebraska, and we wish her well.

He then stated that with Ms. Valentine's departure, the AG's office had assigned Brooke McCarrick to be the new counsel for the Commission. Mr. Lamb advised the Commission that they could find some information on Brook's professional history in their packets and that he would hit some of the highlights listed. He noted that Brooke had a law degree from the University of Maryland, had been practicing law in the state of Missouri since 2002; and that she had worked for several private law firms in the Lake of the Ozarks area until 2009 when she began employment as a legal counsel for the Department of Social Services. He stated that she had represented that state agency until 2014 when she joined the agriculture environmental division of the AG's office and she has worked at number of cases for the department, including several that involve hazardous waste and underground storage tank issues, and that Brook has over 14 years of legal experience representing both private and public entities, with experience representing several state agencies along with the Department of Natural Resources. He stated that in her role with AG's office he felt confident that she has the experience needed to represent the Commission in any legal matters that they would have.

Ms. McCarrick then addressed the Commission and advised that she would take every opportunity to learn whatever was needed to serve the Commission effectively. She thanked the Commission and stated that she looked forward to working with them in the future.

No questions were posed by the Commission. This was provided as information only and required no other action on the part of the Commission.

4. RULEMAKING UPDATE

Mr. Tim Eiken, Director's Office, addressed the Commission and provided an update on recent rulemaking efforts. He began by stating that it had been several months since the last meeting so there were several updates related to rulemaking. He noted that first of all there are two rulemakings (No Stricter Than and the Fee Rule) that had hearings on them last year and have been officially published in the code of state regulations; so, they are on the books and in effect. But, he stated, that being said, the process never ends; so we've already begun the process on our next rule package. He advised that some of the things that the Program is looking to include in that package are related to those two packages that we just completed, because there's always things you find when you adopt a new rule package. He stated that there are references that are missed and that there were unintended consequences to changes

that are made. He advised that you find something else that you need to fix and now that you've changed one thing, you will need to change something else. He noted that with the fee rule there are references in other rules to the previous fee structure that need to be removed to eliminate confusion and to avoid conflicts with the new rule.

Mr. Eiken also advised that we started to look at some recent federal rules as the last federal update is through the 2013 Code of Federal Regulations. But, he advised, since then there's been two more years of federal rules that have come out that we're looking at adding to the regulations. He stated that in particular, one of those rules is the definition of solid waste rule that provides an exclusion from management as a hazardous waste for generators who reclaimed and recycled certain types of hazardous secondary materials. He stated that department staff has been meeting internally to evaluate if it's a good fit for Missouri. He noted that Missouri does have an exclusion that allows a choice on whether or not that rule is picked up. So, he advised, we're just gathering information on how we think that one would affect our program. He stated that consideration was being given to how, in particular, it would affect our resource recovery program and our permits section; which covers a lot of the same ground that is covered by the exclusion. He stated that review was being made as to how many facilities could potentially operate under that and in what types of ways; how it would affect their generators status and fees, and those kinds of things. Mr. Eiken noted that the department is considering those things and will probably be moving on that package at some point this year. He went on to state that the agency was currently in the phase of identifying what's going to be in the package; but, that they definitely plan to begin the formal rulemaking process later this year; so, that's the first thing that we've been working on since the last meeting.

Also, he advised, the underground storage tank rule package that Heather Peters had been working on has more updates that she will provide later on in the meeting. He noted that we have gotten feedback from the Environmental Protection Agency (EPA) on our draft rules that were originally submitted and we have incorporated their feedback into those draft rules. Mr. Eiken advised that staff has worked with stakeholders and gotten their input on the draft rules, and gotten EPA's input, and all that has led to the preparation of the draft rules themselves. And, he advised, along with the regulatory impact report (RIR) that is associated with those draft rules, those two documents are now waiting for internal approval to begin the next step in the formal process. He stated that the process included publishing the RIR for a 60 day comment period and submitting the draft rules for interagency review. He noted that with the Interagency Review, a handful of other state agencies get the first crack at the draft rules, and the first opportunity to provide input. So, he advised, we're waiting for approval to distribute the draft rules and to publish the RIR, and that may happen prior to the next Commission meeting.

He went on to advise that there were two new federal rules proposed last year around October, with comment periods that had ended in December. He noted that one dealt with hazardous waste generators and one dealt with pharmaceuticals. He stated that the department and the program submitted comments on each of those rules and provided some input; which for the most part was supportive of what the EPA was proposing to do with those two rules. He noted that these comments related to some specific items that we thought could result in improvements to the final rule. He stated he was not sure when those final rules will come out

as the EPA expects both of those to be finalized later this year. But, he noted, the generator rule in particular has some issues in it that overlap with some of the issues that we address with our “no stricter than” package; such as generator labeling, and the types of information they put on their containers of hazardous waste. He stated that the federal rules do have some requirements that are different from what we currently have in our Missouri regulations; so, if that particular rule is adopted as proposed, we probably would have to go back and revise our Missouri requirements to be consistent with the federal requirements. He went on to advise that the other issue is satellite accumulation, and that we did make some changes in our rules last year but with what the EPA has proposed, if they adopt as proposed, we might have to go back and look at our state regulations on that issue. He noted that we did submit a comment letter to the EPA so we're waiting to see what their final decision is.

Mr. Eiken ended his presentation by stating that he believed he would have more information to offer at the next meeting and there may have been publication of the RIR for the Tanks rule package to notify the Commission about by then; but otherwise, staff is just continuing to work on developing the next rule package and expect to move towards the formal filing step at some point this year.

No questions were posed by the Commission. No other action was required on the part of the Commission.

5. MISSOURI RISK BASED CORRECTIVE ACTION UPDATE

It was noted that the agenda reflected that Mr. Tim Chibnall would be presenting this agenda item, but was out and Dr. Chris Cady would be making the presentation today. Dr. Chris Cady, Brownfields Voluntary Cleanup Program Section, addressed the Commission and stated that with regards to the Missouri Risk Based Corrective Action (RBCA) rule development, our latest efforts have been stakeholder group meetings. He advised that there had actually been a couple of different meetings held to discuss revising the RBCA guidance and updating the risk-based target levels (RBTL's). He stated that the RBTL's were the clean up targets for soil and groundwater, and that the stakeholder group has about 40 members. He noted that this group included consultants, industry representatives, local government, attorneys, REGFORM and also staff from the Hazardous Waste Program, including himself. He stated that the group, which also included Department of Health and Senior Services staff, was trying to get feedback from the MRBCA user community to get ideas on how to implement some of the things being looking at. He advised they were trying to get a feel on how users were responding to the changes we are were proposing, and stated that the group has met twice, first on December 19th and again on February 3rd. He also stated that the meetings were productive, with a lot of technical information to cover; but, it appeared that it was going pretty well.

Dr. Cady then provided an overview of some of the topics the group was discussing, stating that first and most important, was the updating of the RBTL's. He noted that they had not been updated since 2006 and were out of date, especially in terms of toxicity numbers. He advised that they were proposing to switch models for calculating those numbers to be more in line with the EPA regional screening level methods and that would result in drastic changes in the way they were calculated. He went on to note that the second topic was whether to

actually remove the RBTL's from the rule, so they can be updated more regularly without rulemaking. And, the third was a proposal to expedite updating the RBTL's for a small number of chlorinated solvent compounds; perchloroethylene (PCE), trichloroethylene (TCE), and a couple of their degradation products. He noted that he would talk more about some of these later in the presentation.

Dr. Cady then stated that vapor intrusion was another big topic as the science was rapidly changing with regards to vapor intrusion and there were changes we'd like to make to keep up. He noted that another one included several issues related to site characterization and risk assessment, which staff thought would be a good idea to discuss with stakeholders. Dr. Cady advised that none of the stakeholders opposed doing an update, and stated that he felt most everybody understood that these numbers needed to be updated regularly. He also noted that one stakeholder was opposed to removing RBTL's from the rule, but a final decision hasn't been made on the toxicity numbers. He advised that the EPA puts out updates regularly, but for us, with the amount of time that it takes to actually update numbers, plus rulemaking, it can be quite a long period of time. He advised that this was warranted to do as soon as possible, given the changes in the way we calculate the numbers, it can result in a pretty significant change in the final target levels. And, he advised, with those numbers, we are out of step with Superfund's using it at their sites; and, there is a fairly significant percentage of our sites that have chlorinated solvent contamination, so as a result, we propose to update those numbers outside of a rulemaking. This is proposed under the authority of 10 CSR 25 18.010, which includes a 60 day public comment period, and would be happening fairly soon. He also stated that the department would obviously include the stakeholders in this effort, along with a larger email blast and web posting to try to reach as many people as possible. He advised that staff would then consider and respond to all the comments received; and, assuming that this goes forward, the updated RBTLs would be in effect for those chlorinated solvents by June or July of this year. He noted that the RBTL's for all other contaminants would be updated through the regular rulemaking process and that DHSS has indicated that they will be able to add a large number of chemicals to the 2006 list, providing flexibility when we see different chemicals showing up at sites.

Dr. Cady then went on to advise that with regards to vapor intrusion, based on our discussions with stakeholders we formed a vapor intrusion subgroup of a stakeholder group as there is a rapidly evolving science and there are a lot of issues to discuss. He noted that we're in the process right now, after the third meeting, of forming a subgroup that will meet sooner than the larger stakeholder group, to develop vapor intrusion guidance to include in the revised MRBCA document. So, he noted, at this point it appears at least two additional stakeholder meetings will be needed to work through all of the issues as some of the more significant remaining ones include cumulative risk calculations, which is the summation of risk from all chemicals in the site; and, the other one is developing risk-based target levels for total petroleum hydrocarbons for gasoline ranges. He stated that once the stakeholder group has addressed all of those issues, they will begin drafting revised guidance and staff will ask the stakeholders to review each section. He went on to note that once the guidance revisions are complete and we have revised draft will be adding an expanding various parts and will begin a rulemaking to make corresponding changes to the rule and update the RBTLs. He also stated that we're anticipating the rulemaking would begin late this year. He also advised that the next meeting of the stakeholder groups should be in April, and that the subgroup would

probably meet in March. He also noted that staff has recently revised the MRBCA web pages and there is actually a special page on the update itself. He noted that this included proposing meeting minutes and announcements and documents, in case anyone needs information. Dr. Cady advised that it was nice to get moving on this as the department has been thinking about it for a long time; and, there's a lot of work to do so good to get moving. An opportunity was given for the Commission to present any questions.

Commissioner Jordan inquired as to whether there was a date set yet for the April subgroup meeting. Dr. Cady responded that we have not scheduled a date for that meeting yet; but, it would be posted on the web page as soon as we know it. He also advised that there was a mailing list available for those who just wanted to get announcements. He noted that it doesn't mean you have to join a stakeholder group, that there was just a place on the webpage where you can sign up to get on the mailing list.

No other questions were posed by the Commission. This was provided as information only and required no other action on the part of the Commission.

Chairman Adams noted that the next presentation would be exempted from the 15 minute time limit on presentations due to the nature and volume of the information that would be provided.

6. SOURCES AND CAUSES REPORT

Mr. Ken Koon, Chief, Tanks Section, addressed the Commission and noted that he would be sharing this presentation with Ms. Heather Peters, Compliance and Enforcement Section who is the underground storage tank (UST) inspection coordinator for the department. He noted that the presentation was given last year and it was decided to make this an annual event as the Commission had seemed interested last year, and to provide a little bit more detailed information on the report. Mr. Koon provided a PowerPoint presentation for the Commission.

Mr. Koon began his portion of the presentation by stating that it was a report of underground storage tank releases, which they were required to do for the EPA as part of the 2005 Energy Policy Act and noted that it was done in December of each year. He went on to state that it covers the federal fiscal year which is October first of each year to September 30th of the next year, so this particular report covers October 1, 2014, to September 30, 2015. Mr. Koon noted that the report was actually posted in November 2015, as it was gotten out a little bit early. He also noted that the actual sources are defined by: tank, piping, dispenser, submersible turbine pump, delivery problem, other and unknown. He went on to state that unknowns were probably the biggest category you'll see as most of these are found when they go out and do tank closure assessments. They are already spending money to remove the tanks so they don't spend a lot of money to specifically find out where the leak is coming from. He then stated that causes are defined as spill, overflow, physical or mechanical damage, corrosion, installation problem, other or unknown.

Mr. Koon advised the Commission that during this year's period we found 90 UST releases, which included 13 new releases from operational issues or during the inspection process; two were found during inspection/complaint of historic contamination; and, 75 of those were found when somebody did a Phase II Assessment during a property transaction or during the

tank closure. He then turned the presentation over to Ms. Peters who discussed the specifics of each known release.

Ms. Heather Peters, Compliance and Enforcement Section, addressed the Commission and began by noting that her presentation would walk through those specific sites where we actually knew what happened. She referenced the report and noted that it lists out for EPA what each one of the sources and causes are and that the EPA has a very specific listing. She advised that the Commission that they each had a copy of the current report and she would be walking them through each one of our reports for specifics and would describe what actually happened in each one of the sites. Ms. Peters began with a site located in Independence, Missouri, and advised that the City of Independence got a call that they were getting some vapors in the sewer, and had gone looking. She advised that what they found was petroleum vapors and liquids in the sewer so they started following those vapors and liquids up the sewer, which led to a gas station. She noted that this was a pretty easy way to find the source. She advised that the city began doing some testing at the site of all of their system, and found that what failed was their premium line. She noted that the tests were followed up with a helium test and explained the process. She went on to note that the Environmental Emergency Response (EER) team found that the leak was coming from right above a fitting, so they dug it up and they found that the leak was coming from the joint in the fiberglass line. Ms. Peters noted that this is a pretty common way that we find leaks and that what we found was that the fiberglass joint was leaking on the premium UST system.

Ms. Peters then noted that the second site we had was a Flying J system in Warrenton, Missouri, and stated that this one was caused by the dispenser being hit by a semi-truck. She noted that this type of accident happens from time to time, and that the site lost approximately 1,200 gallons when the dispenser got hit. She noted that they are still doing cleanup at the site from that accident and that it was just one of those things that can happen.

She noted that the third the third site was at Lambert International Airport, and that this one is a little bit unique and was kind of interesting for us because Lambert International Airport is an airport system, and this is one of those sites where the operations of the UST systems at this site are not regulated. But, she advised, the leaks are regulated, and the operations will be in our new regulations. Ms. Peters went on to state that what happened was that product started showing up at the site. She referenced a location on a slide where Lambert has a creek that actually runs underneath the airport; so, the tanks are on the airport at one location and the creek runs underneath the airport and that the product started showing up in the creek where it comes out underneath airport. She noted that they started testing and that they have a very unique way to test the lines through this system. She stated that, as you might imagine when you have millions of gallons moving through the system you can't test it quite the same way you would for just a gas station; but, they did do some testing and they found where the leak was. She advised that it was at a specific terminal, and a specific gate at the airport, and when they tested it they found the connection. Ms. Peters noted the connection was rusted and you could see holes in the middle of the valve. She stated that it was replaced and that they have started doing the cleanup at this site.

Ms. Peters then stated the next site is the Chamber's Conoco site in St. Louis County. She noted that it was a similar situation as the first one she discussed, and again started with

vapors in the sewer. She advised that EER did the same thing, they started chasing the vapors until they stopped, which led them to a gas station. Ms. Peters referred to a picture of the monitoring wells. She noted that these monitoring wells are a great way for us to check and find out what is going on at a site; although not all underground storage tanks have monitoring wells, but when they do it's a great way for us to do a quick look at the site and see what's going on in that tank. She noted that when they checked the wells they did find product, which is a pretty good indicator we probably have a leak. She stated that EER made the station start doing tightness testing of the tanks and the lines and found a failure in the line system. She stated coincidentally, it was the exact same problem that we have at the last time: it was again a fiberglass joint that had failed. She stated that the owner had the system repaired with another fiberglass joint and they are still doing ongoing remediation at the site.

Ms. Peters then advised the Commission that the next site was a new installation at a brand new Loves station, in July of 2014, in Neosho, Missouri. She stated that the installation went exactly as it supposed to, and that inspections were done of the installs in July and September. She stated that when we go to the installs we watch them put the tank in the ground and we watch them put the pipe in the ground; and, when they finish the testing on those lines, we make sure that it's holding. She noted that everything tested perfectly fine. She advised that they finished the construction at the site; the site was getting ready to open; they put fuel in the tank and they start running the equipment to make sure all the equipment's working correctly. She states that they start running fuel through the system and they think that the equipment's not working correctly because nothing is holding pressure but previous tests were fine so they keep running fuel into the system and they actually lost 6,000 gallons of fuel by the time this is over. But, she advised, they kept running fuel through the system before they finally figured out something was wrong. She stated that when they started looking they found an area damaged by a backhoe that was not reported to the station or the contractor. She stated that somebody else was out there doing work, installing some electrical conduit for something not related to the tank system, and apparently had hit the pipe. She stated that they hit the piping multiple times and covered it up without reporting it to anyone. The UST's contractor didn't know that so they kept running the product line trying to figure out what was wrong with the equipment, thinking it had to be an equipment issue, but as it turned out it was the piping.

Ms. Peters then stated that the next site she would review was the Wildcat Corner site, in Neosho, Missouri. She stated that during a regular line tightness test, which is required to be done routinely, it failed. She noted that they redid the testing and it still failed so they went ahead and shut it down and started investigating, looking into their system to figure out what was wrong. She reported that they found the leak in the threads of the flex connector. She advised that they removed flex connector and replaced it then started doing their sampling and found the contamination. She stated that they are still working at this site. She noted that the flex connector was right outside the dispenser and referred to a photo provided in her PowerPoint.

Heather then advised that the next site referenced in the report that she was going to review was located in Rolla, Missouri. She noted that during an inspection the inspector found that there was a small amount of product in the tank top area. She noted that it wasn't a lot, but it was enough that we didn't know where it was coming from and it wasn't a containment area.

Ms. Peters provided a picture and noted where they had found a small amount of product. Ms. Peters stated that inspectors went back a couple months later and again found product so the owner was contacted and advised there was a need to figure out where this product is coming from. She stated that there was some investigation and some testing, and that during this closer look, the contractor actually did confirm that there was product and when they started digging they found again another fiberglass fitting that was leaking. She stated that they did repair the system, they did sampling for contamination and there's some site characterization that's needed.

The next site Ms. Peters referenced was located in Cameron, Missouri, and she advised that this site had a number of issues that were going on at one time. She noted that one issue was caused when a truck hit a dispenser. She advised that, much like the site earlier, following the incident the operator did a line tightness test, which is an appropriate response. She advised that they were trying to figure out if there was any damage to the line after the incident. She then stated that it failed the line tightness and the contractor couldn't figure out exactly where the damage was, so they put the line back into operation and still could not find the damage. She stated they then tried to do another line tightness test. After being unable to find the leak after several tries they decided that, instead of trying to find the failure, they were just going to install a new set of lines. She stated that they went ahead and installed a new set of lines; in the new trenching, they encountered fresh product and they ran into the old line and found where the old piping was delaminating. Ms. Peters stated that what they found was this piping was old and it had been sitting in contamination for a long time and the inner part of the piping and the outer part of the pipe were no longer attached to each other. She stated that it appeared that when the truck hit the dispenser the piping was already so soft that it just pulled the pipe apart, as it was the perfect storm. She reported that there were a number of factors that came into play that probably caused this type of failure..

Ms. Peters began her explanation by noting that a lot of the inspections of active sites are done by a contractor inspector and this was probably a good site to explain how having a contract inspector works in Missouri. She advised that we have someone that works for both the Department of Natural Resources and for the Petroleum Storage Tank Insurance Fund (PSTIF) right now, from Rounds and Associates, and that they do a lot of inspections so they're the ones that many times will find these releases. She stated that they were required to send information back to the department, usually within 24 hours. She noted that the inspectors are required to provide enough information so a determination can be made as to whether there is a need to send out the emergency response folks and that we also coordinate this information with PSTIF. She stated that, for example, on this site we have a suspected release that was reported to us within 24 hours. She noted that the inspector sent us a video to go along with the inspection. Ms. Peters narrated as the video was shown, noting how significant the leak was. She went on to advise that a video of a leak size gives a really good idea of how quickly we need to respond, as we coordinate these with the emergency response team to decide whether or not we need to send them out. She advised the Commission that we do try to send somebody on everything so that we have as much information as possible. She noted that the owner and contractor went out to the site almost immediately, and did confirm that there was product in the tank at the site. She stated that they pumped out the product and as soon as they did product came right back into the tank. She noted that the department asked for some sampling and there is ongoing work at this site as well.

Ms. Peters then described the Main Street Shell site in Kansas City Missouri and advised that the investigation of the site started as a report of gasoline vapors in a sewer. She noted that the emergency response team responded to the complaints and found product in the sewer. So, she advised, they again they followed the sewer and where they come up was near a gas station, so that is typically where they start looking. She noted that the release detection records at the site were reviewed and that it was found that there was a very old automatic tank gauge at the site. She stated that electronic tank gauges do great job of doing release detection and old is not necessarily a problem as they can be working very well for a very long time. But, she stated, at a certain point they are really hard to maintain and making sure that those parts are still working is very difficult; so, in our new regulations, owner/operators will have to start doing operability testing.

Ms. Peters went on to state that during the site review it was hard to tell whether or not the system was accurately testing to make sure that the system was tight; and, there was also some inventory discrepancies. She advised that they did some tank tightness testing and found that one of the tanks failed and then found that the tank was empty. She stated that when it was looked at further, they found holes in the bottom of one of the tanks. Ms. Peters stated that the tank is a four thousand gallon tank and they emptied the tank after they found holes in the bottom of the tank. They replaced the tank gauge at the site in October 2015. She advised that the release detection issue has been resolved and that sampling has been required; and that there is active remediation going on at that site. She stated that there are still some residences impacted in the area.

Ms. Peters then advised the Commission that the story doesn't end there with this particular site, as this site appears on your list twice. She noted that is not a typo because this site actually delivered fuel to the tank a second time after it was empty and they had found holes in it. She stated that they had ordered a load of fuel and they had accidentally delivered it to the holey tank.

Ms. Peters went on to provide a review of the next site on the list, a C-Store in Parkville, Missouri. She noted that the issue at the site was found on the Friday before Labor Day, at three o'clock in the afternoon. She noted that the issue was found by our contract inspector and stated that they had found fuel bubbling up through standing water in the access area. She advised that they had sent a video of this one too, and photos were provided for the Commission. She stated that the photo showed where product was bubbling up through the gunky water and that it's so full that it's actually over flowing out of the top of that area. She noted that the owner was extremely responsive, as we got this call close to three o'clock in the afternoon and the owner had gotten a contractor to the site, the contractor had pumped out this area, found the part that was leaking, replaced the parts and the store was back up and running before the end of the day. She went on to note that they did find the leak in a flex connector and sampling has been requested.

Ms. Peters then advised that the next two are two that were found during inspection complaints and that neither of these would be considered new releases. But, she stated, they were found during the inspection process, not during a Phase II. She went on to note that a complaint had been called in and they had noticed a "gunky" area in the back of this property, and when it was investigated it was found was that there was a huge drainage area with all this

dead vegetation. She advised that there was a gas station above the area and it appeared that when they built their tank they decided to install a pipe from the tank pit that came out and drained on the back side of the hill. She stated that it appeared to have been there for a while and there were no signs of fresh product coming out of this area; that it was an older station and had been there awhile. She stated that the owner of this site is going to conduct sampling around it as there was some staining so they're going to do some additional investigation. Ms. Peters advised that this one is in Doolittle, Missouri.

She then said this site was a Pump N Pete's. She advised that the site is a little unique as it has had repeated inspection issues over the years. She noted that we have found evidence of contamination and during an inspection in 2009, we found evidence of minor product in the tank top area. She reported that during that inspection there is some minor weeping but nothing was significant, and they cleaned it up immediately. She stated that there was nothing that looked like a significant leak at that time. She went on to report that in 2012, again, there is a very minor leak in that area and they addressed it; and we came back right afterwards and everything was clean and clear in the tank top area so we didn't think there was anything significant going on. But, she advised, in 2014 we came back and decided that there were some issues that we thought were going on at the time so we came back and did their inspection and found product in the tank top area. In addition to the product found in the tank top area we also found absorbent pads that are put in there that will absorb the product, but will not absorb the water. She noted when the contractor was there, he photographed and documented this product in this area; so when the DNR inspector went out the next day and checked the site, they checked multiple tanks and again found absorbent pads; which means that not only did we have product in that area, but that the owner was aware of product. She went on to state that in a check of one of the other wells we also found product, which means we have product in the area around the tank system. And she noted, at that point in time, we told the owner that they are going to have to do some sampling around the site and that they were going to need to investigate the extent of contamination. She stated that at this point we don't have any signs of an ongoing significant release from this UST system; they have passed a tank and line tightness test, and they have release detection that is ongoing at this facility. So, we are not requiring additional leak detection at this time as we do not have any evidence that suggests ongoing leaks, but, we are requiring sampling and site characterization at this facility.

Ms. Peters addressed the Commission and stated that the most important question that comes out of all of this is the need to reevaluate what seems to be the source of our new problems and what should we be doing about that. Ms. Peters summed up the issues that had been cited and noted that of the leaks found, there were five caused by metal components; and of these there were two flex connectors, two fittings, and one tank. She reviewed the issues of how they were caused by corrosion, wear and tear or install issues. She went on to advise that of the sites reviewed, three had leaks caused by fiberglass piping couplings. She reviewed the causes of those types of leaks and noted they could be installation issues. Ms. Peters then went on to note that three of the sites had accidents, where vehicles or construction issues had created the damages to the tank and/or pipe system. She reminded the Commission that one had been caused by a weakened piping system, potentially created from constant contact with product. Ms. Peters then stated that the final category was caused from spills or overfills.

Ms. Peters went on to state that the new regulations focus a lot of attention on metal piping components and in the future you're not going to be allowed to have metal piping components outside of containment sumps, outside of the ground or in corrosive environments. She went on to advise that our regulations will still focus a lot of attention on new installs, on all of these fiberglass lines that were installed before we had installation regulations. So, she noted, as we move forward each year we make sure that we're actually taking a look at what is causing the leaks and we are learning from those, and that this information is incorporated in the new rules when they are written.

Ms. Peters provided the Commission an opportunity to ask questions about the information presented to this point.

Commissioner Jordan inquired as to whether if the leaks were governed by pre-installation regulations and if pre-ethanol grade resins were involved. Ms. Peters responded that yes, potentially some of them are governed by those regulations; and, it appeared one of them involved pre-ethanol grade resin.

Commissioner Adams inquired as to whether glues were being discussed, those used at the joints. She noted that tanks with installs prior to 1981, they would not be compatible and there were definitely some concerns about even 10% ethanol blends. She noted that by 1994, those should have all been compatible, and with regards to that install, from 1989, the piping should have been compatible with 10% ethanol.

Commissioner Jordan then inquired as to whether, during inspection of the leak area, did you take that section out, and look at the joints carefully to determine if it was an installation issue with the glues. Ms. Peters responded that this type of inspection had not been done. Commissioner Adams inquired as to whether it was all glue issues involved in the leaks. Ms. Peters advised that there were two ways that a joint could fail. She stated that they could be glued improperly, and that when they go to do an install they make sure now that they watch them and ensure they are glued properly. She also stated that now they actually have to pass the pressure vacuum test at the time of install and we go in the morning after the system has been on all night. She noted that back then this type of testing was not done, and that the joint could have been leaking from day one. She advised that even the slightest air bubble or water bubble can create a leak as fiberglass will vibrate and it could have possibly expanded. She also stated that there are rising concerns about fiberglass and older fiberglass and ethanol right now; and that even with new systems there are always potential for something to go wrong, even under the best of conditions.

Chairman Adams acknowledged Ms. Carol Eighmey, Executive Director, PSTIF, and she advised that in some cases, some of the claim adjusters send pieces of piping off for testing.

Commissioner Foresman then referred back to a slide on page six of the presentation and advised that the photos appeared as if the piping was extremely close to the surface and stated he thought that it could be subject to movement from the vehicles driving over the area, and that that type of piping did not flex. Ms. Peters responded that it appeared to just be the angle that the photo was taken from and that there were burial depth requirements.

Commissioner Aull inquired as to at what point will the old sites with old piping and joints be investigated. Ms. Peters responded that this issue was under discussion and was something they would be coordinating with PSTIF over, as it was something they (DNR and PSTIF) had noted before this. She stated that fiberglass tanks installed prior to 1981 were not compatible with ten percent ethanol and that gasoline right now is up to ten percent. Commissioner Aull referenced vapor intrusion issues and Ms. Peters advised that it was incompatibility issues with fiberglass and the gasoline. She stated that they really had not had any reason for alarm up to that point as the failures had just begun happening in the last couple months.

Heather also noted that there was another issue and that was that there's enhanced corrosion going on with ethanol now and it's microbial and it's causing issues. She reported that we've got brand new systems that have been in the ground for short periods and when you pull inspections there is this compound that looks like it's been there for thirty years. So, she noted, it's a combination of ethanol compatibility, but there's some other factors and we'll be talking about microbes in the future.

Ms. Carol Eighmey interjected that she was glad that addressing these issues was being done smarter, and that people were paying more attention, but she wished to point out that there were over 3500 operating UST systems across the state with over 15,000 dispensers, and that we have only had 11 leaks in the year. She stated that she felt that was a pretty good ratio. She also stated that she felt that when all these new systems and rules are put in to place that the cost benefit needed to be kept in mind.

Commissioner Aull inquired as to what percent of the systems in place had tanks that were subject to the incompatibility issues. Ms. Peters reported that there were very few, and that the issues that had been found had been addressed quickly and the process had worked like it should.

Mr. Ken Koon again addressed the Commission and advised that he was be finishing up the presentation by providing information on Aboveground Storage Tanks (AST)., He advised them that the EPA report used to contain this information but that now the EPA did seem to want to know. He reported that during the same time period there were 11 total AST releases. He noted that one was from an overflow, two were physical or mechanical damage, and eight were historical releases from Phase II assessments/investigations found when there was a property transaction or something like that. He provided the Commission an opportunity to ask any other questions and ended his presentation.

Ms. Peters provided the Commission an opportunity to ask questions about the information presented to this point.

No other questions were posed by the Commission. This was provided as information only and required no other action on the part of the Commission.

7. FINANCIAL RESPONSIBILITY UPDATE

Mr. Mike Martin, Compliance and Enforcement Section, addressed the Commission to provide a short update on the UST financial responsibility. He stated that there were currently

about 3,438 facilities operating in Missouri, and as of the 2nd day of February's report, there were 43 of those sites that were out of compliance with the financial responsible requirement. He noted that of those 43, there were 13 that had been referred to the AG's office, and that 15 were currently being worked with in the Enforcement Unit as active cases. He went on to advise that of those 15, four were currently in the process of referral to the AG's office. He also noted that 15 had been provided letters or Notices of Violation and that the others have had initial notifications so staff could work with them to try to get them in compliance before they would have to take enforcement action. He advised the Commission that they were still holding around a 99 percent compliance rate. Mr. Martin noted that the financial responsibility requirement was in place to make sure UST facilities have the money to clean up if a release occurs.

No questions were posed by the Commission. This was provided as information only and required no other action on the part of the Commission.

8. "NO STRICTER THAN" OUTREACH AND IMPLEMENTATION EFFORTS

Nicole Eby, Compliance and Enforcement Section, addressed the Commission noting that she wished to provide a quick update on the work they had been doing to make sure the regulated community, our inspectors, and everyone else is prepared and ready to implement the rules that went into effect December 2015. She made a quick reminder that these regulation changes were prompted by passage of section 260.373 Revised Statutes of the State of Missouri (CSR) and affect Title 10 of Division 25. She noted that this also incorporated some new Code of Federal Regulations (CFR) and those rules became effective on December 30th. Ms. Eby acknowledged that the Commission was probably very aware of the background regarding these rule changes and noted that when the rules were published in the state register, that was when outreach efforts really started in earnest because then they knew exactly what they were going to look like. She went on to advise that, with regards to our outreach efforts, the first thing that was done was a three-page mail out to every hazardous waste generator with their fee invoice for the year. She noted that it provided a brief summary of the regulations and some fact sheet type of information on some of the bigger changes that were taking place. She also advised that it referenced the webinars that were scheduled to be held and referenced the webpage where people could find more information. She stated that this encompassed between 4,000 and 5,000 mail outs that were actually sent; noting that it was a pretty big undertaking.

Ms. Eby then went on to explain that two webinars had been conducted. She stated that the first one in was held December 2, which covered the basic chapters and basic changes; and the second webinar, held December 9, covered the other items, like the federal adoptions and the things that were not in Chapters three, four and five. She advised that there were 227 signups for those webinars and that a lot of those were multiple viewers from the same sign up location. She stated that although we had people fill out that information, there had not been a count of the actual attendance as some of those were department employees. She noted that employees represented a pretty small amount considering that inspectors make up a pretty small amount of that 227, but that most of them did participate and take the chance to learn.

Ms. Eby advised, with regards to the rule update web page, she felt it would be better just to show the Commission and went to it as part of her PowerPoint presentation. She noted that there was background information provided to explain why the rule changes took effect and that the webinars were posted along with those presentations. She advised that there was also a video of the webinar and that the webpage contained the Gov.delivery sign up, which was also new. She went on to state that notices specifically regarding updates may periodically be sent out in a blast to everybody. Ms. Eby advised the Commission that the webpage is where a lot of our information updates are presented, and that it changes daily, or weekly as we get information updated. She also advised that staff have been working very hard to do updated factsheets, updated checklists, and reviews and updates to all of our publications. She noted that it is a slow process; and just administratively, we review, we evaluate somebody else's reviews, and then see something else that needs to be addressed. Ms. Eby then reported that during this review, it had been noticed that some of our fact sheets aren't really any different than what the EPA provides and if our regulations are not any different, then we have deferred to those publications. She noted that in some cases we provide links to those at the bottom of our references to this information and have found it also makes things easier in terms of keeping them updated. She advised that the only thing we really have to do when we do that is make sure links work as opposed to adding new pages; so that has helped a lot.

Ms. Eby then referenced the Frequently Asked Questions section and noted this was started with the questions that remained after the webinars, and as new questions come up we're trying to address them and post them out there. She advised that there were lots of inquiries about satellite accumulation, labeling, solvent wipe regulations that have gone into effect, and we're doing our best to answer them because as we start implementing those rules were coming up with a lot of questions of our own.

Ms. Eby ended her presentation by noting that staff had participated in the Regional Office/Central Office workshop (ROCO) with our inspectors and noted that most of the EPA inspectors for Region seven were there as well. She stated that they were very interested in learning what had changed for us when they inspect and that it was very helpful for us when implementing federal regulations that hadn't been ours before. She noted that it was a really good chance to learn and distribute and share information.

No questions were posed by the Commission. This was provided as information only and required no other action on the part of the Commission.

9. PESTICIDE COLLECTION EVENTS FOR 2016

Mr. C.J. Plassmeyer, Compliance and Enforcement Section, addressed the Commission and advised that he was providing an update on the upcoming 2016 pesticide collection events schedule. He noted that the web page had been updated to include the 2016 pesticide collection events. In addition he pointed out a brochure about the Missouri Pesticide Collection Program was recently created, with the link to the brochure posted on the Pesticide Program webpage. He advised that he would provide a little background information on the collection program funding, how the program began, and was going to look at the farmer exemption. He noted that he had provided some information on that in the past but had never really included specific regulations and/or statutes on why farmers are exempt from hazardous

waste generator requirements in Missouri. He also stated that he would be providing information on the commercial pesticide applicator training which he participated in in January.

Mr. Plassmeyer had a PowerPoint presentation and began with a screenshot from the web page, noting that the main thing he wished to point out was that this year they are going to be accepting empty triple rinsed plastic pesticide containers, up to 30 gallons in size. He advised that through the years he had received several inquiries from farmers wanting to know if we can take these empty containers, and that the department had actually found a company that would accept them. He stated that if we get a minimum of 1,000 pounds they come and collect the containers free of charge for us; so, they were going to see how that works out this year.

He referenced the schedule and noted that the collection events were starting out in Portageville, very early in the year; and was actually less than a month away. He stated that this first event would be held on March 12th, at the Fisher Delta Research Center. He noted that the location was the same as last year and that there had been a really good turn out there.

He went on to note that the second event would be held in Poplar Bluff at the Baker Implement Company on March 26th. He stated that the main reason they were starting so early this year was that he had been advised that if collection events do not get started in March they may not have a very good turnout, as farmers like to get out in the fields very early if the ground is ready to work.

Mr. Plassmeyer advised that the third event was scheduled to be held near Fairfax, MO, on April 9th, way up in the northwest corner of the state; at the University of Missouri, Graves-Chapple Research Center. He noted they had coordinated with the University of Missouri research farms again this year, because it was very successful last year and was a place farmers like to come to for field days. He also noted that these research centers can help get the word out about these events whenever they hold training and outreach at their locations.

The fourth event he noted was the on May 21st at the Canton Recycling Center. He went on to advise that the city officials are very excited of this opportunity and looking forward to working with us on this collection.

The fifth event he advised would be held in Montgomery City at the Montgomery County Road and Bridge Department on June 4th; and the sixth collection, the last one, was scheduled to be held in Bolivar on June 25th, at the C&C Farm and Home Center.

Mr. Plassmeyer noted that copies of the flyers were provided in the Commissioner's packets in the event they had an opportunity to spread the word. He noted the flier included a map and pesticide safe handling tips on the back along with the website to the Missouri Pesticide Collection Program webpage address on the front.

In addition to the pesticide collection schedule, Mr. Plassmeyer explained that the Pesticide Program webpage goes into detail about what we do accept and what we do not accept at the collections.

Mr. Plassmeyer indicated a new fact sheet was recently created titled, “Managing Pesticide Waste.” He mentioned the fact sheet is a good resource for businesses looking to properly dispose of waste pesticide. He explained the fact sheet goes into some detail on how to determine if your pesticide is a hazardous waste. He advised the fact sheet provides a list of active ingredients of pesticides and if the active ingredient of the pesticide needing disposal is on that list you need to determine how many pounds you have needing disposal which then determines the hazardous waste disposal method to be used.

Mr. Plassmeyer reminded the Commissioners that the program actually started in 2012 as a Supplemental Environmental Project through a settlement with Walmart, and that money was spent on pesticide collection events by 2013. He stated that in 2013, as part of the agreement with the Department of Justice, Walmart made a community service payment of three million dollars to the department. The department asked the court if the money could be spent for pesticide collections. He mentioned the previous pesticide collection events from 2012 through 2013 were very successful and noted that the Commission had encouraged spending the money on additional pesticide collection events, which is why it was decided to provide more pesticide collection events using Walmart’s community service payment.

Mr. Plassmeyer then provided information on the farmer exemption from the statute. He noted that the Missouri Revised Statutes outlines the responsibilities of those who generate hazardous waste and noted that it states that individual householders and farmers who generate only small quantities of hazardous waste on an infrequent basis are exempt from hazardous waste generator requirements. He noted that the Code of State Regulations defines “farmer” as a person primarily engaged in the production of crops or livestock for agricultural purposes or both. He provided the statutory definition of “person” and noted this is what allowed us to accept the waste from farmers.

Mr. Plassmeyer went on to note that during the whole month of January he had participated in the commercial pesticide applicator training. Throughout the state where there were 1950 commercial applicators that came through the training. He noted that there were multiple agencies involved including the Departments of Agriculture, Conservation, and the University of Missouri Extension. He stated that they all had a part. He noted that his talk mainly focused on pesticide waste disposal, and that the main topics he covered were the different programs within the department that had the potential to be involved with pesticides, such as water pollution, and preventing drinking wells from becoming contaminated from pesticides. He also noted that he had spent the most time on hazardous waste and how to properly dispose of waste pesticide and stated that he had actually went through two different pesticide related emergencies that happened just this past year; which puts it in a real-life perspective that these emergencies can happen at any time when you probably least expect them. Mr. Plassmeyer provided the Commission an opportunity to ask any questions regarding the events or the information he had covered, and ended his presentation.

No questions were posed by the Commission. This was provided as information only and required no action on the part of the Commission.

10. ANNUAL REGISTRY UPDATE

Ms. Valerie Wilder, Superfund Section, addressed the Commission and provided an overview of the Annual Registry Report. She advised that the registry was compiled of the Abandoned or Uncontrolled Hazardous Waste Disposal Sites. She advised the Commission that there was one staff member in the unit who was responsible for keeping the registry and producing the registry every year. Ms. Wilder provided some background and noted that the registry law was passed by the Missouri legislators in 1983 and it basically authorizes the Department to investigate and assess sites with confirmed hazardous waste and it allows for responsible parties to complete a clean-up under state oversight, or if they choose not to do so, their site will be placed on the registry. She stated that we have not placed anything new on the registry in the last ten years or so and the last one was placed on the registry in September of 2003. She stated that we currently have 64 sites on the registry, but just because we have a site assigned on the registry, it doesn't mean we don't continue to investigate hazardous waste or hazardous substance sites. She went on to describe that staff work with the responsible parties to put them into the programs like the BVCP, or the state Superfund Cooperative Program, or one that we can turn over to EPA for removal action. She stated that the registry is essentially an institutional control mechanism to protect human health and the environment when hazardous waste is present or left in place and that the registry provides for notification on properties that are contaminated. She stated that this notice is filed with the deed with the County Recorder of Deeds and it also provides for department personnel to conduct annual inspections on each of the sites to ensure that no major changes have occurred and the status of the site provides for a notification to prospective buyers about the hazards on site and the legal ramifications if they choose to buy the property. She noted that it requires that a property owner must provide the Department a change of use notification letter if they decide to change the use of the property or do any kind of digging or anything that might disturb the hazardous waste on site. She stated that the site owners are also obligated to notify the department within 30 days if they sell their property and the registry also provides for public information.

Ms. Wilder advised the Commission that the department was responsible for publishing the report and that a copy of the printed report or a copy of the CD was available for each of them, whichever they would prefer. She noted that it was also published on our website in a PDF format. She went on to report that the registry was approximately 2234 pages of extensive information about the location of the property, the owner, the lead agency in charge of cleanup, and the site description including a paragraph about what contaminants of concern are associated with the site. She advised that if there are any public drinking water concerns or advisories, those are noted, along with any remedial actions that are being performed.

She noted that the report contained detailed information about all of these issues and at the end there's a health assessment prepared by the Department of Health and Senior Services, who provides write ups for each and every one of those sites each year. She stated that all the sites on the registry are classified as one of the following:

Class 1: Sites that are causing or presenting an imminent danger of causing irreversible or irreparable damage to the public health or environment. Immediate action is required.

Class 2: Sites that are a significant threat to the environment. Action is required.

Class 3: Sites that do not present a significant threat to the public health or to the environment. Action may be deferred.

Class 4: Sites that have been properly closed and require continued management.

She stated that Class 1 sites are the ones that are causing or presenting an imminent threat to public health and the environment and that right now we only have one site in that category. Then, she noted, as each of the classifications go down, the risk to human health and the environment decreases also.

Ms. Wilder went on to state that the city of Springfield had petitioned the department, back in 2012, to delete a site from the registry. She noted that the department had worked with the city to get environmental covenants in place for both the Sac River Landfill and the Fulbright Landfill. She stated that the environmental covenants were now in place so efforts are being made to remove the site from the registry.

Ms. Wilder went on to note that the only other change to the annual report was an administrative change to the verbiage that had to do with appeals; noting that the Administrative Hearing Commission (AHC) would now hear any appeals and make recommendations to the Hazardous Waste Management Commission. She advised that the authority for the AHC to hear appeals was transferred to them in August 2013 and the language in the book was updated. She also stated that the department was obligated by law to provide the registry in a report to the governor and the legislature by January of each year. She stated that copies were also sent to the county commissioners where the sites are located. She stated that there have been some administrative changes to the book over the years to make it a little bit more and we provide links to all the National Priorities List sites in Missouri. She noted that the registry also contained a list of the registry consent agreements for the sites where the responsible party has chosen to enter into an agreement with the Department to do a cleanup and that there was currently eight of those sites in the book, along with an updated table of any sites that have been removed or the action has been suspended over the years. Ms. Wilder ended her presentation by inquiring if the Commissioners had any questions.

No questions were posed by the Commission. This was provided as information only and required no action on the part of the Commission.

10. QUARTERLY REPORT

Ms. Amy Feeler, Public Information Officer, addressed the Commission and presented the Quarterly Report for the period of July through September 2015. She began by highlighting grant monies received to do brownfield assessments. She went on to note information provided on five-year reviews and the vapor intrusion article that was written by the Hazardous Waste Program's Federal Facilities and Superfund sections. She noted that these articles outline the life of a site as long as it still has hazardous substances, pollutants and contaminants, and for as long as they remain. She advised that staff will keep doing the five-year reviews on these sites and that the five-year review process has changed a bit to include vapor intrusion; and, due to the EPA having a more conservative screening level they

wanted to increase awareness for the protection of people and the environment from the harmful effects from vapor intrusion.

No questions were posed by the Commission. This was provided as information only and required no action on the part of the Commission.

12. LEGAL UPDATE

Ms. Brook McCarrick addressed the Commission and advised that she had no new legal issues to discuss at that time. She thanked the Commission and ended her portion of the agenda.

No questions were posed by the Commission. This was provided as information only and required no action on the part of the Commission.

13. PUBLIC INQUIRIES OR ISSUES

Mr. Kevin Perry addressed the Commission during the Public Inquiries agenda period, introducing himself and advising he was with the Regulatory Environmental Group for Missouri business association (REGFORM). He advised that REGFORM represented businesses all over the state of Missouri that comply with environmental regulations, including hazardous waste regulations. He noted that he wished to say thanks to the department, and particularly Dr. Chris Cady for his presentation earlier. He went on to advise that today he wished to speak on the stakeholders group that has been meeting regularly on the updates to the risk based target levels; and, he noted, because of the shift in the target levels it is driving a change in the actual guidelines for how Missouri does these cleanups. He stated that there was a very substantial technical discussion at the last meeting and that it was very fruitful, and that he thought there was lot of progress going to be accomplished as a result of that group.

Mr. Perry went on to outline a distinction between risk analysis and risk management and noted that risk analysis is the process that you go through to come to understand just how harmful or carcinogenic a particular agent might be. And, he advised, then there's the actual management of those harmful substances and the process of risk analysis. He went on to state that risk analysis has always been governed by the Department of Health and Senior Services (DHSS), and management of those risks has been done in house. He noted that due to the chemical, biochemical, and sophisticated analysis that go in to the numbers on these new risk-based target levels, the involvement of the DHSS is of critical importance and very much appreciated. He noted that a lot of important work was being done that we thought we'd be working in Missouri with the most current information that we have regarding the potential harms associated with these chemicals.

Mr. Perry noted that an offshoot of these discussions has been a more regular interaction with stakeholders and the department and the DHSS. He went on to advised that one of the features of risk-based cleanup in the state of Missouri is that we're not going to clean up a site to pristine, there will be stuff left behind; but, the stuff that we leave behind makes sense because we've done a risk-based analysis of the site and the people that could possibly be exposed at the site. He stated that the risk-based corrective action process in the state of

Missouri determines a screening level and then provides three tiers that a site owner can possibly go through. He noted that the process was spelled out in the Missouri regulations and that when people do these type of risk base closures of contaminated sites they do everything they can to avoid a tier three evaluation because it's so expensive and so costly.

Mr. Perry also discussed the different options that Mr. Cady had presented earlier and noted that his group had some concerns regarding some of the ways the DHSS is addressing some of the Risk Based Target Levels (RBTLs) and noted that conversations were going on. He stated that he had had this conversation the DNR, but had yet to open a conversation with DHSS. He noted again that it was a concern to his members and it was a concern to folks who can look down the road and see where they might be involved in property transactions where this will be an issue. He advised that he just wanted to let the Commission know that this is an important conversation and that he appreciated the department's participation. He also noted that that Dr. Cady referred to a stakeholder communicating an interest in not taking the RBTLs out of the regulation and advised that his members have looked at this issue and would like to see the target levels remain in regulation. He stated that he just wanted to make clear to the Commission that the reason that his group opposed taking the RBTLs out of the regulation is because the regulation itself contemplates this very thing and makes two provisions for how new numbers could come online without going through the full two-year rule regulation process. He stated that he believed the regulation as it stands right now is sufficient to meet this need.

Mr. Perry finished his narrative by stating that he appreciated the fact that the department very heavily participated in REGFORMs November Hazardous Waste Seminar and their contribution to helping people who attended a seminar come to an understanding of the new regulations. He also noted that that he appreciated their participation as there were a lot of questions asked and he felt that it did a lot of good. He also noted appreciation of the other efforts the department had done to get the word out on the new regulations. He inquired as to whether the Commission had any questions of him.

No questions were posed by the Commission. This was provided as information only and required no action on the part of the Commission.

14. OTHER BUSINESS

Mr. David J. Lamb, Director, Hazardous Waste Program, addressed the Commission and noted that the legislative session started in January, so we're about six weeks into the process. He advised that so far there's really only been two bills that we are looking at that could impact the Hazardous Waste Program. He noted that the first one he wished to mention was Senate bill 669, which was a bill that would transfer certain fees, bond forfeitures and penalties that are assessed by the department, and move them into General Revenue. He stated that for the program, this would specifically impact our Hazardous Waste Fund, our Environmental Radiation Monitoring Fund and our Drycleaning Environmental Response Trust Fund; so we have three separate funds that would be impacted in that sweep. He advised that there was a hearing held on this bill on January 19th and he believed there were eight people who testified; and all were in opposition of the bill. He went on to note that in regard to its current status, that bill has not had any action taken since that hearing.

Mr. Lamb then went on to state that the other one he wished to mention was a Senate Bill 600; a bill that would create the hazardous waste home acquisition program. He stated that under that program any homeowner who owns a home within three miles of the Westlake Landfill, the Bridgeton Landfill or Coldwater Creek, would be able to apply to sell their home to the Department of Natural Resources. He stated that obviously a program of that size would involve a lot of additional staff and resources for the department to undertake and advised that the estimated fiscal impact of that bill was seven billion dollars. He noted that it obviously was a big undertaking if it were to move forward; but, at this point, similar to the other bill, it had a hearing but it hasn't had any movement since that date, no action to vote it out of committee.

Mr. Lamb then advised he would like to provide a quick update of some of the highlights for the program and the governor's recommended budget. He noted that in general, the appropriations we requested were very similar to those we requested last year and that all of the requests that we did make were approved and included in the governor's recommendation. Essentially, he noted, the hazardous waste program receives its funding from three different parts of the department's budget. There's a hazardous waste program core and our program specific distribution under that core has appropriations in the amount of \$11,199,255, which also includes appropriations for 134.42 FTE. Secondly, he advised, under the petroleum related activities core, it includes appropriations for personal service and expense and equipment related to petroleum activities in the amount of \$779,360, which includes appropriations for 16.2 FTE. And, he stated, the third one is our environmental damages core which provides program specific distribution appropriations as well as expense and equipment appropriations in the amount of \$6,157,917. He went on to note that in addition to these core elements, each year we do request the legislature appropriate a general revenue transfer to the Hazardous Waste Fund to cover the cost of our cost share obligations for Superfund projects. He noted that we are obligated to pay 10 percent of the cost of those cleanups as well as the operation and maintenance for all the projects that are being funded through our superfund state cooperative agreements with the US EPA, and that this year we had requested \$961,176, for that specific appropriation.

Mr. Lamb then advised that the only other thing he wanted to note related to the governor's budget was that it included a two percent pay raise this year for all state employees, which would start July 1. He stated that although a lot of people are very interested to see that included in the budget, at this point we are still very early in the process. He noted that there have been a few hearings on the budget bills but there is still a long way to go before the budgets are finalized.

On other budget issues Mr. Lamb noted that he also wanted to mention a few things at the national level. He advised that the president's recommended budget includes the budget for the EPA, which provides a lot of the funding to the program that we use to operate. He noted that there are four main areas that we receive funding from EPA for; our Brownfields grant, our RCRA grant, our Superfund grant, and our underground storage tank grant. He stated that for these areas, as proposed, funding is relatively stable and similar to what was proposed last year. He advised that there were a few areas where there were actually a few minor increases; but; but he noted, this is just the president's recommendation, it has not gone through Congress and it was a little too early to tell what may actually get approved. Mr. Lamb went

on to advise that there was one other thing he wanted to highlight, and that was that the president's budget did have an increase of \$3.4 million dollars for the development of the E-manifest IT system; so, if that request does make it through the budget process, that will help EPA move forward with the development of that system with the goal of having it in place by spring of 2018. He noted that this obviously had a big impact for us as well to have that system in place and that it would be nice to see that included in the final budget.

Mr. Lamb provided the Commission the opportunity to ask questions regarding the budget issues he had presented, to which there were none. Mr. Lamb then noted that during the next week he was being given a unique opportunity to participate in a meeting where a visitor coming to the Kansas City area from the country of Mongolia. He noted that a group called Global Ties Kansas City actually arranged this and the department was contacted about potentially meeting with her to explain the state's role in hazardous waste issues. He stated that she was a state sponsored visitor and was a senior officer with the Mongolian Department of Environment and Natural Resource Management. He noted that her goal in coming to us was to learn about hazardous waste issues as it was one of the areas under her purview in her position. He stated she was coming to the Kansas City area and she wanted to talk to someone on the state level, in addition to talking to those at the local area. He advised that he believed Commissioner Bracker was also going to be meeting with her in a separate meeting, to talk about the Brownfield program that has been implemented in the Kansas City area, so it was an interesting opportunity.

Mr. Lamb also advised that he had a couple of other things he wished to mention, with the first being a quick reminders that the Personal Disclosure Forms were sent out by the Missouri Ethics Commission, and that if they had not already been received, they should be getting them soon. He noted that they needed to be completed by May 1st. He also advised the Commissioners that at the next meeting it was time for the elections of officers, as we do that every year at the second meeting of the year. He stated that the elections will be on the agenda, so he requested that they start thinking about that for the next meeting.

Commissioner Aull stated that she wished to commend the department for their efforts with the Pesticide Collection Program and noted that she had been here from the beginning, from when the first problems were noted, then the funding being awarded and through the development of the program as it had developed. Mr. Lamb advised that it had been a lot of work and commended Ms. Flippin and her group and noted that further educational efforts were being developed as the program continues to grow.

No other questions were posed by the Commission. This was provided as information only and required no action on the part of the Commission.

Chairman Adams reminded the Commissioners that elections would be held at the next meeting and tasked them to keep that in mind.

15. FUTURE MEETINGS

Chairman Adams noted that the next meeting was scheduled for Thursday, April 21, 2016.

Commissioner Adams adjourned the meeting at 12:12 p.m. No questions were posed by the Commission. This was provided as information only and required no action on the part of the Commission.

Respectfully Submitted,

Debra D. Dobson, Commission Assistant

APPROVED

Charles Adams, Chairman

Date

Missouri Hazardous Waste Management Commission Meeting

**April 21, 2016
Agenda Item # 3**

Certification of New Staff Director

Information: The Commission shall conduct the formal vote to approve the appointment of Steve Sturgess as the Staff Director for the Hazardous Waste Management Commission, in follow-up to the preliminary approval obtained by the Department via e-mail.

Recommended Action:

Certify Mr. Sturgess as the Department's Staff Director to the Commission.

Presented by:

Hazardous Waste Management Commission

Motion Language:

“I move to approve the appointment of Steve Sturgess as the staff director for the Hazardous Waste Management Commission, pursuant to subsection 640.010.2 of the Revised Statutes of Missouri.”

**Missouri Department of Natural Resources
Hazardous Waste Management Commission
Certification of Decision**

Certification of Steve Sturgess to the Position of Staff Director to the Hazardous Waste Management Commission.

Motion Language:

“I move to approve the appointment of Steve Sturgess as the staff director for the Hazardous Waste Management Commission, pursuant to subsection 640.010.2 of the Revised Statutes of Missouri.”

We hereby certify the appointment of Steve Sturgess to the position of Staff Director to the Hazardous Waste Management Commission.

DATE: April 21, 2016

Charles Adams, Chairman

Elizabeth Aull, Vice-Chairman

Mark E. Jordan, Commissioner

Jamie Frakes, Commissioner

Andrew Bracker, Commissioner

Michael Foresman, Commission

Missouri Hazardous Waste Management Commission Meeting

**April 21, 2016
Agenda Item # 4**

Officer Elections

Recommended Action:

The Commissioners to elect a Chairman and Vice-Chairman.

Presented by:

Hazardous Waste Management Commission

**Missouri Department of Natural Resources
Hazardous Waste Management Commission
Certification of Decision**

DATE: April 21, 2016

On April 21, 2016, the members of the Hazardous Waste Management Commission held an election of officers.

_____ was elected as Vice-Chairman by a majority vote.

Michael Foresman, Commissioner

Elizabeth Aull, Commissioner

Andrew Bracker, Commissioner

Jamie Frakes, Commissioner

Mark Jordan, Commissioner

Charles Adams, Commissioner

**Missouri Department of Natural Resources
Hazardous Waste Management Commission
Certification of Decision**

DATE: April 21, 2016

On April 21, 2016, the members of the Hazardous Waste Management Commission held an election of officers.

_____ was elected as Chairman by a majority vote.

Michael Foresman, Commissioner

Elizabeth Aull, Commissioner

Andrew Bracker, Commissioner

Jamie Frakes, Commissioner

Mark Jordan, Commissioner

Charles Adams, Commissioner

Missouri Hazardous Waste Management Commission Meeting

**April 16, 2016
Agenda Item # 5**

Rulemaking Update

Information:

The Hazardous Waste Management Commission to be provided an update on recent rulemaking activities.

Recommended Action:

Information Only.

Presented by:

Mr. Tim Eiken – Rule Coordinator, HWP

Missouri Hazardous Waste Management Commission Meeting

**April 21, 2015
Agenda Item # 6**

Legislative Update

Information:

The Commission to be provided an overview of current legislation, which may impact the Missouri Department of Natural Resources.

Recommended Action:

Information Only

Presented by:

Mr. Tim Eiken – Director’s Office, HWP

Hazardous Waste Program

Legislation of Interest

April 2016

SB 600 - This act modifies provisions relating to hazardous waste

HAZARDOUS WASTE HOME ACQUISITION PROGRAM (Sections 260.850-260.865) - This act creates the Hazardous Waste Home Acquisition Program. Under this program, any homeowner who owns a home within 1 1/2 miles north, northeast, or northwest of I-70 at Exit 232A within the Spanish Village Subdivision may apply to sell their home for fair market rate to the Department of Natural Resources. Application criteria and timeline requirements for application decisions from the Department of Natural Resources are set forth in this act. In addition, this act sets forth an order of priority that the Department of Natural Resources shall follow when purchasing homes. Funding for the program will be subject to appropriation to the Hazardous Waste Home Acquisition Program Fund.

Under this act, if the Department of Natural Resources and the homeowner disagree with the homeowner's appraisal of fair market rate of the home, the Department shall also perform an appraisal on the home. Concurrently, the Department and homeowner shall mutually agree upon an appraiser to perform a third appraisal. The fair market rate of the home shall be determined by averaging the fair market rate of all three appraisals. In the event that a party is dissatisfied by the averaged fair market rate, they may seek expedited review in any court of competent jurisdiction.

Under this act, Hazardous Waste Home Acquisition Program costs shall not exceed \$12.5 million.

RADIOACTIVE MATERIAL DISCLOSURE (Section 441.236) - Under this act, any seller or renter of a premises that was contaminated with radioactive material, who knows that such premises was contaminated with radioactive material, is required to disclose such radioactive contamination to any buyer or lessee in writing. Any person failing to make such a disclosure shall be guilty of a Class A misdemeanor.

Status: SCS voted Do Pass on March 1 – Senate Commerce, Consumer Protection and the Environment Committee

SB 669 - This act transfers certain fees, bond forfeitures, and penalties assessed by the Department of Natural Resources from dedicated funds managed by the Department of Natural Resources to general revenue

Status: Hearing conducted on 1/19/16 – Commerce, Consumer Protection, Energy, and the Environment Committee

Senate Substitute for SB 657 - This act modifies provisions relating to liability for the use of incompatible motor fuel

SS/SCS/SB 657 - This act modifies provisions relating to liability for the use of incompatible motor fuel.

PETROLEUM STORAGE TANK INSURANCE FUND (Sections 319.114 & 414.036) - Under this act, an owner or operator shall not be denied benefits by the Petroleum Storage Tank Insurance Fund if their claim arises from a release of motor fuel or a regulated petroleum substance that is incompatible with the motor fuel underground or aboveground storage tank system, except in cases of fraud on the application for coverage.

MOTOR FUEL LIABILITY (Section 414.255) - Under this act, no refiner, supplier, terminal, wholesaler, distributor, retailer, or other vendor of motor fuel that is blended with ethanol or renewable fuel that complies with motor fuel quality and labeling laws shall be liable for property damages related to a customer's purchase of such motor fuel so long as the selection of motor fuel was made by the customer and not the vendor. No motor fuel that is blended with ethanol shall be considered a defective product for purposes of property damage claims.

Under this act, auto dealers and manufacturers shall not be liable for property damages related to a customer's purchase of motor fuel blended with renewable fuels if the selection and purchase of the motor fuel was made by the customer and does not comply with specific fuel recommendations found in the vehicle owner manual.

This act is similar to provisions contained in HCS/HB 1102 (2015), HCS/SB 148 (2015), and HCS/SCS/SB 131 (2015).

Status: Referred to House Select Committee on Agriculture – March 8, 2016

HB 2733 - Consent for sampling on private property

This bill prohibits a federal or state agency, political subdivision, or private contractor from collecting samples of substance located on private land without the express written consent of the landowner. If an entity intends to conduct tests or surveys in a county, a written letter and description of the tests or surveys must be delivered to the county commission.

Status: Read second time on March 15, 2016

HB 2746 – Recycling of hazardous secondary materials for zinc fertilizer

Currently the Hazardous Waste Management Commission may not promulgate rules more stringent than the federal promulgated rules under the Resource Conservation and Recovery Act, except for specified reasons. This bill removes the ability for the commission to be more stringent than the federal rules relating to hazardous secondary materials used to make zinc fertilizers.

Status: Referred to House Energy and the Environment on March 30, 2016

Missouri Hazardous Waste Management Commission Meeting

**April 21, 2016
Agenda Item #7**

Operator Training

Issue:

The Missouri Petroleum Storage Tank Insurance Fund (Fund) and the Missouri Department of Natural Resources will soon be coordinating the implementation of the Underground Storage Tank (UST) Operator Training Program.

Information:

The 2005 Energy Policy Act required states develop and implement an operator training program for UST facilities. To meet that requirement, the Fund has created an on-line program, free of charge for Missouri UST operators.

The program includes a full training program or a test-only option for both “Class A/B” and “Class C” Operators. Class A/B operators are required to know the UST regulations and how they are met at their specific facilities. These are typically environmental managers, owners, and upper-level managers. Class C operators must simply be able to identify a spill, overflow, release, emergency or threat and know how to respond. These are generally on-site staff, like store clerks, on-site maintenance staff, and responders.

The UST operator training regulation requires operators be trained by July 1, 2016. The Department and the Fund will soon be requesting operator training documentation be submitted to their respective agencies. If a site currently has a policy with the Fund, the Fund will be the lead implementing agency. To avoid duplication of requests, the Department will be requesting records only from sites that are not currently covered by the Fund.

This presentation will outline the Operator Training Program, the associated regulation, and the upcoming implementation.

Recommended Action:

Information only.

Presented by:

Ms. Heather Peters, Environmental Scientist, Compliance and Enforcement Section



Underground Storage Tank Operator Training

Heather Peters



Laws and Regulations

- 2005 Energy Policy Act
- 319.130 Revised Statutes of Missouri
- 10 CSR 100-6.010 (Regulation)



Operator Training Program

- On-line Now!
- <http://optraining.pstif.org>
- Class A/B and Class C
 - Course with test
 - Test Only option
- Free! Funded by the Missouri Petroleum Storage Tank Insurance Fund (PSTIF)
- Can take in “pieces”

The screenshot shows the homepage for the Missouri UST Operator Training program. At the top, it says "MISSOURI UST OPERATOR TRAINING" with navigation links for "About", "Training Options", "Operator Types", and "Regulations". There are two main buttons: "Sign Up & Start Training" and "Existing User Log In". The background is a stylized illustration of a vintage gas station named "Jonny's Service" with a "Route 66" sign. A "User's Guide" button is located at the bottom right. The footer contains the Missouri PST Insurance Fund logo and contact information: "P.O. Box 836 • Jefferson City, Missouri 65102 • Phone: 573-659-7918 • Email: optraining@pstif.org".



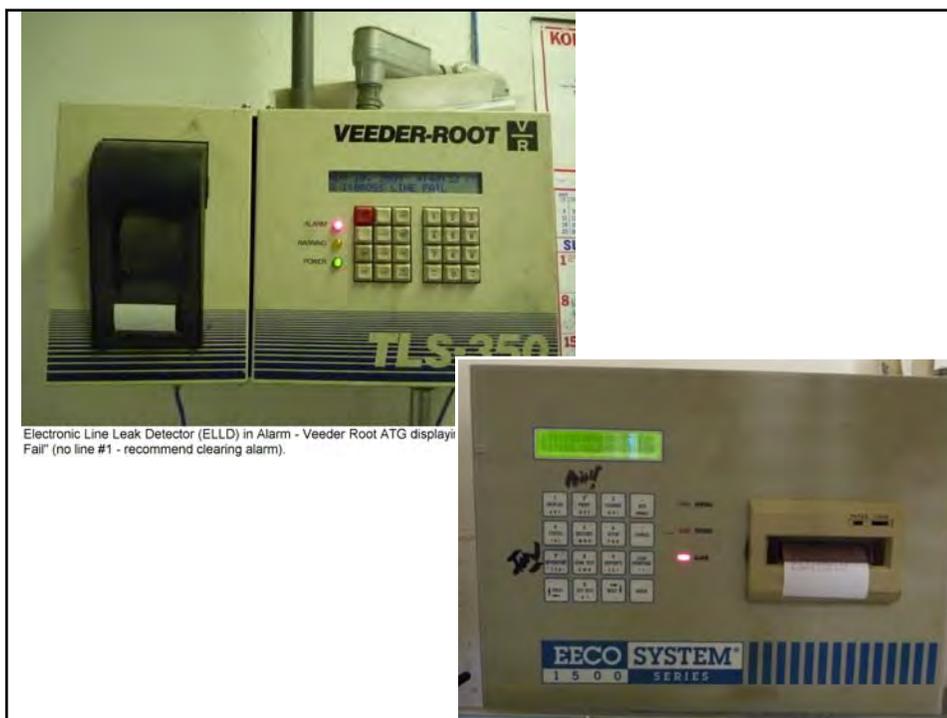
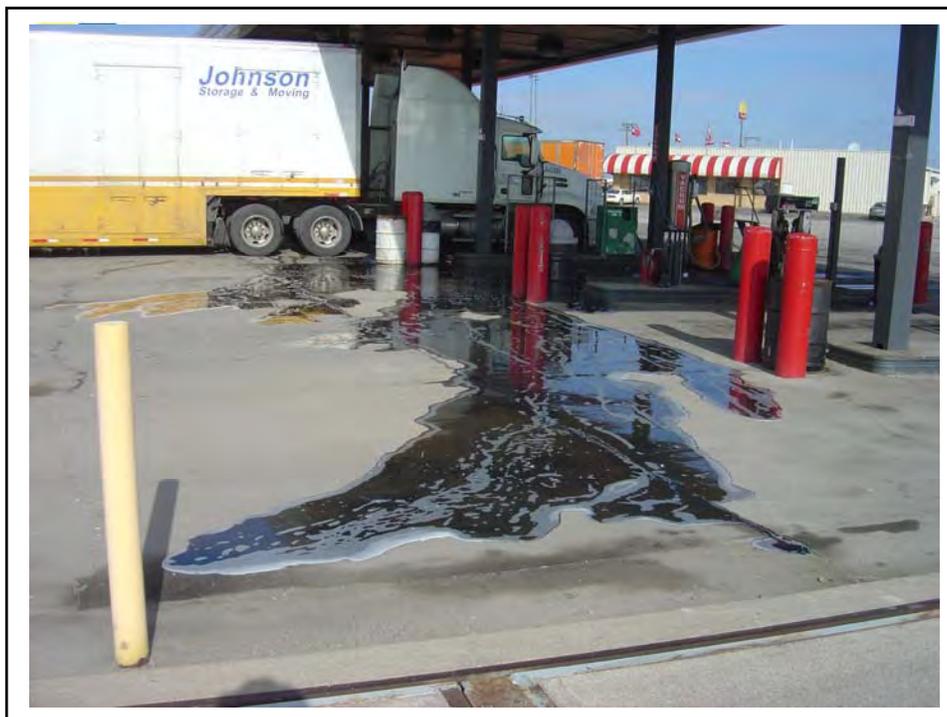
Class A/B Operators

- Know the regulations.
- Responsible for compliance at their site.
- Understand the equipment.
- Be able to answer how they meet the requirements.
- Owners, Environmental Managers
- *Responsible for Class C operator training*



Class C Operators

- Must be trained to respond to
 - leaks,
 - spills, overfills and
 - threats to safety and environment.
 - Store clerks, facility staff





New Class C option

- No certificates/ paper for each clerk
 - Staff turn over
 - Shear volume
 - Tracking and transfer
- Class A/B is designated Class C
- Class A/B certifies Class C staff are trained



Letters from PSTIF and DNR

- Letters will go out in June
- Compliance due July 1, 2016
- Submit response by July 15, 2016
 - To the Fund if insured
 - To DNR if not PSTIF-insured



Future Compliance

- The Fund may check at renewal
- The Department may check at inspection
 - With compliance records
- May request Financial Responsibility (FR) documentation



Re-Training



- Required if Significant Operational Compliance (SOC) Violation per EPA
- Re-training is violation-specific
- May be:
 - Simple discussion of violation
 - Request to take training course
 - Alternative approved by both owner/operator and the Department



Questions about Operator Training?





JEREMIAH W. (JAY) NIXON
GOVERNOR

WILLIAMS & COMPANY CONSULTING, INC.
THIRD PARTY ADMINISTRATOR

June 01, 2016

Named Insured
Named Insured Address
NI City, ST Zip

Policy No: 000XXXXX-XX
Site Name, Site Address, City, MO

Dear Tank Owner/Operator:

Missouri law and rules require the owner or operator of every in-use underground storage tank (UST) to designate a Qualified Class A/B and C Operator for the UST by July 1, 2016. This person must be properly trained and/or pass a test on operating and maintaining USTs. To comply, you may use the free training offered by Missouri's PSTIF at www.pstif.org, or the training offered by Arkansas, Oklahoma, Kansas, Iowa, Illinois, Kentucky, or Tennessee.

In addition, the Class A/B Operator must ensure that he/she has trained the on-site personnel who are responsible for initially responding to a spill or release from the tank system, known as Class C Operators. This can be accomplished by using the free training at www.pstif.org or similar Class C training offered by Arkansas, Oklahoma, Kansas, Iowa, Illinois, Kentucky, or Tennessee, or the designated Class A/B Operator can train Class C personnel himself or herself. A trained Class A/B Operator is "automatically" a qualified Class C Operator.

The purpose of this letter is to give you an easy way to demonstrate you have complied with this new requirement. If you complete this form and return it with a copy of the Class A/B training certificate by July 15, 2016, you will have demonstrated compliance and will not be required to provide further documentation.

Should you have questions, please call Megan Burton at 800-765-2765.

Sincerely,

A handwritten signature in cursive script that reads "Carol R. Eighmey".

Carol R. Eighmey
Executive Director

ENCLOSURE



Petroleum Storage Tank Insurance Fund

P.O. BOX 104116 • JEFFERSON CITY, MO 65110-4116 • PHONE (800) 765-2765 • FAX (573) 761-4062

Draft DNR Implementation Plan for Operator Training

(For Non-PSTIF-Insured Sites)

Initial Implementation:

- DNR will send a mass mailing in June 2016 to the contact person for each non-PSTIF-insured site where there is at least one UST in use.
- As forms are returned, we will enter the name of the Class A/B Operator for each site/owner into our database. Supporting training documentation must be provided if the training/testing was not conducted through the PSTIF.
- For sites whose o/o did not return the form, we will require this same form be signed and returned to us as they renew their annual FR submittal and/or are inspected. This means that, by July 1, 2019 or shortly thereafter, we should have the name of the Class A/B Operator in our database for every non PSTIF-insured site.
- For new UST installations after July 1, 2016, o/o must complete the Operator designation form before we will close the new installation inspection (either complete the form with us or PSTIF).
- For previously- PSTIF insured sites whose o/o applies for FR approval after July 1, 2016 using a mechanism other than PSTIF, we will confirm that we have an A/B Operator on file or request that the complete the form.

Ongoing implementation:

- As we review inspections, the o/o will be required to review and verify that the name of the Class A/B Operator has not changed on their records request form.
- If the operator has changed, we will require a new form and supporting documentation (if training was not conducted through the PSTIF).

PSTIF Plan for Implementing Operator Training Rule
(10 CSR 100-6.010)

Initial Implementation:

We will send a mass mailing in June 2016 to the named insured for each site where there is at least one insured UST in use; see attached.

As forms are returned, we will enter the name of the Class A/B Operator for each insured site into our database. (We hope to receive the form back for ~1500 sites.)

For sites whose o/o does not return the form, we will require this same form be signed and returned to us in order to renew coverage. This means that, by July 1, 2017 or shortly thereafter, we should have the name of the Class A/B Operator in our database for every PSTIF-insured site.

For new UST installations (or previously-uninsured sites) whose o/o applies for PSTIF coverage after July 1, 2016 and before July 1, 2017, the attached form will be required as a condition for issuing coverage.

Ongoing implementation:

During FY17, we will redesign our renewal form so the name of the Class A/B Operator from our database is printed on it, (as is done for site and tank system information, etc.).

Beginning July 1, 2017, when each policy renews, the o/o will be required to review and verify that the name of the Class A/B Operator has not changed.

During FY17, we also will redesign our form for new applicants/sites to incorporate the "double-wall requirement" that will go into effect on 7/1/17. It also will ask for the name of the Class A/B Operator for the site and will ask him/her to certify the Class C personnel have been trained, eliminating the need for the supplemental form.



MISSOURI DEPARTMENT OF NATURAL RESOURCES
HAZARDOUS WASTE PROGRAM



**CLASS A/B & CLASS C OPERATOR DESIGNATION FORM AND CLASS C
OPERATOR TRAINING CERTIFICATION**

For this designation to be accepted, each section must be completed. Training is required for Missouri Class A/B and Class C persons pursuant to 10 CSR 100-6.010.

Designation of Class A/B and Class C Operator

I am the designated Class A/B and Class C Operator for the facilities listed in this section.

If you did not use the on-line testing or training program at www.pstif.org, please provide your state-issued certificate from Arkansas, Oklahoma, Kansas, Iowa, Illinois, Kentucky or Tennessee.

***Choose one of the following. Make sure you have provided the correct information for your choice. This designation applies to:**

Only the facility(ies) listed: _____.

All facilities owned by the following owner (Provide either owner identification number(s) or owner name and address(es). _____

All facilities on the attached list (must provide a list of facilities).

I hereby certify that all Class C operators are properly trained pursuant to 10 CSR 100-6.010.

- Class C Operators have successfully completed the on-line training provided by the Missouri Petroleum Storage Tank Insurance Fund at www.pstif.org; or
- Class C Operators have passed the on-line test-only option offered by the Missouri Petroleum Storage Tank Insurance Fund at www.pstif.org; or
- Class C Operators have been properly trained on identifying and responding to alarms, spills, releases and other indications of an emergency, including:
 - Initial response to spills and overfills
 - What to do in the event of a spill, overflow or release
 - Who to contact in the event of these emergencies

I am affiliated with: the owner the operator an independent contractor

CLASS A/B and C OPERATOR NAME (PRINT)

E-MAIL ADDRESS (PREFERABLE EMAIL ADDRESS ASSOCIATED WITH ON-LINE CERTIFICATION)

CLASS A/B and C OPERATOR SIGNATURE



Jeremiah W. (Jay) Nixon, Governor

Sara Parker Pauley, Director

DEPARTMENT OF NATURAL RESOURCES

dnr.mo.gov

Owner or Facility Name
Address
City, State Zip Code

RE: Operator Certification for Underground Storage Tanks (USTs)

Dear UST Owner/Operator:

Missouri law and rules require the owner or operator of every in-use UST to designate a Qualified Class A/B and C Operator for the UST by July 1, 2016. This person must be properly trained and/or pass a test on operating and maintaining USTs. To comply, you may use the free training offered by Missouri's Petroleum Storage Tank Insurance Fund (PSTIF) at www.pstif.org, or the training offered by Arkansas, Oklahoma, Kansas, Iowa, Illinois, Kentucky, or Tennessee. If you choose to comply with the training from an approved state, you must provide a certificate issued by the state.

In addition, the Class A/B Operator must ensure that he/she has trained on the on-site personnel who are responsible for initially responding to a spill or release from the tank system, known as Class C Operators. See enclosed form for more information.

The purpose of this letter is to give you an easy way to demonstrate you have complied with this new requirement. If you complete the enclosed form and return it with a copy of the Class A/B training certificate by July 15, 2016, you will demonstrate compliance and will not be required to provide further documentation. The form should be returned to Ms. Angela Oravetz, Missouri Department of Natural Resources, Hazardous Waste Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102-0176 or via facsimile at (573) 526-5268.

If you have questions regarding owner/operator training, please contact Ms. Heather Peters at (573) 751-7877 or Ms. Angela Oravetz at (573) 751-5403. Thank you for your efforts to comply with Missouri's UST Law and Regulations.

Sincerely,

A handwritten signature in blue ink that reads "Heather Peters".

Heather Peters
Environmental Specialist

HP:ca

Enclosure



Recycled Paper

Missouri Hazardous Waste Management Commission Meeting

**April 21, 2016
Agenda Item # 8**

Tanks Backlog Plan

Issue:

Tanks Backlog Plan

Information:

In June 2013, after an analysis of data on remediation projects, the Department and the PSTIF initiated discussions on how to accelerate the pace of remediation projects. These discussions culminated in a plan that was signed by both organizations in March 2014, which contained specific strategies and actions. The Department will update the Commission on the progress of these efforts and recommendations for future actions.

Recommended Action:

Information only.

Presented by:

Mr. Ken Koon – Chief, Tanks Section, HWP



Tanks Backlog Plan

Ken Koon, Chief
Tanks Section

April 21, 2016



Strategies for Backlog Reduction

- A. Improving processes on stalled cleanups with RP's
- B. Provide training
- C. Enhance communication to resolve disagreements
- D. Abandoned site identification
- E. Reduction of paperwork



A. Improving Processes

- Identified 52 sites where DNR and PSTIF need to move RP to action
- DNR dedicated one staff to work on idle sites
- 35 sites have restarted, 3 sites received NFA, 11 classified as abandoned, 3 referred to enforcement



A. Improving Processes

- Improve follow up when RP fails to respond (new tracking system)
- 2014/2105 - DNR reviewed 487 idle sites, sent out over 500 status letters, increased Letters of Warning and Notices of Violation
- 2016 – we continue to review sites that are not moving forward



A. Improving Processes

- Number of documents received has increased
- Document review times have decreased
- Number of NFA's increased
- DNR/PSTIF communication has increased
- Site visits and meetings have increased



B. Provide Training

- Consultants need better guidance on RBCA and remediation process
- DNR and PSTIF sponsored joint webinars, provided links to other training sources, and DNR provided training at the MWCC
- Have seen some improvements in submitted documents
- Need to figure out how to get more participation from consultants



C. Enhance Communications for Dispute Resolution

- Sites idle while DNR, PSTIF and Consultants disagree
- Tiered dispute resolution process
- 2014/2015 Five sites resolved and 15 action plans at Tanks Section Chief and PSTIF Claims Manager
- Three projects elevated to highest tier and one of those has been resolved



D. Abandoned Site Identification

- Reviewed files, responsible party search, ability to pay, etc.
- Have identified 190 abandoned sites
- Department will send letters to parties to try to get all these sites moving
- RSMo 319.131



Backlog 2 Actions

- Review 27 PSTIF “pre-existing remedial claims.” (i.e., where a release was confirmed before the tanks were insured, the tanks that leaked are still in use, and PSTIF benefits will be lost if coverage lapses.)
- 4 of these sites have closed and the consultants have plans to finish several in 2016/2017



Future Actions

- Free Product Recovery
- Developed a fact sheet on resources
- Developing a “how to” guidance for HWP Staff
- Sending out to consultants for comments



Future Actions

- Plume Stability
- DNR/PSTIF in negotiations about experts to help in the process
- DNR proposing national expert with no conflict of interest



Future Actions

- Enhance enforcement
- Use of Administrative Orders and AGO referral



Future Actions

- Continue to focus on timelines and moving sites forward
- Continue to offer trainings to consultants
- Improve the dispute resolution process
- Continue the increased communication and cooperation efforts
- Continue to seek opportunities to address abandoned sites



QUESTIONS?

Missouri Hazardous Waste Management Commission Meeting

**April 21, 2016
Agenda Item # 9**

New EPA State and Tribal Assistance Grant (STAG) RCRA Funding Formula

Issue:

EPA Headquarters finalized their new STAG funding formula in March 2015, which is utilized to calculate federal grant funding amounts to be distributed to EPA Regions, States and Tribes commencing with Federal Fiscal Year 2016 that began on October 1, 2015. Use of the new funding formula has significant implications for the Hazardous Waste Program (HWP) and other elements of the Division and Department supported by these funds. Funding to be distributed to EPA Region VII has decreased by 12% and the funds to be passed through to Missouri have decreased by 30% as a result of the new funding formula. The presentation will discuss the details regarding these decreases and significant concerns that the HWP has with respect to the regulatory universes used in the new formula.

Information:

Information Only

Presented by:

Mr. Richard Nussbaum - Chief, Permits Section



The New RCRA State and Tribal Assistance (STAG) Funding Formula

**Hazardous Waste Management Commission Meeting
April 21, 2016**



EPA STAG Funding Formula

- EPA's STAG formula for RCRA activities had not been updated in almost 20 years.
- In considering potential changes to the STAG formula, EPA solicited input from the states/territories/tribes and state organizations in 2013.
- Missouri provided input regarding the potential STAG formula elements to EPA and the Association of State and Territorial Solid Waste Management Officials (ASTSWMO).



EPA STAG Funding Formula

- EPA announced the new STAG formula on March 26, 2015, to be effective starting in Federal Fiscal Year (FFY) 2016, which is premised on the following major RCRA program areas:
 - Hazardous Waste Generators (primarily enforcement) - 17% SQG, 12% LQG
 - Treatment, storage and disposal facilities (TSDF) permitting (including related enforcement) – 37%
 - Corrective action (including related enforcement) – 34%
- Previous National FFY1995 STAG Funding = \$98,899,700
- Current National FFY2016 STAG Funding = \$99,397,000



STAG Funding Formula Impacts

- Seven EPA Regions (1, 3, 4, 5, 8, 9 and 10) will see funding increases of 2 - 30% and three EPA Regions (2, 6 and 7) will see funding decreases of 9 -15%
- EPA Region 7 STAG funding reduced by 12% from FFY2015 (\$5,882,000) to FFY2020 (\$5,171,165)
- Missouri's STAG funding reduced by 30% from FFY2015 (\$2,823,948) to FFY2020 (\$1,966,594)
- Missouri's reduction of \$857,354 would be phased in over five years (\$171,471/year on average) and represents a potential loss of 8-10 full time hazardous waste funded staff positions once fully implemented
- Other states in EPA Region 7 would actually experience modest funding increases during this five year period



STAG Funding Formula Impacts

- Missouri has expressed concerns to EPA Region 7 and EPA Headquarters regarding the funding decreases and is currently working with EPA to minimize the potential impacts of these decreases
 - Letter of concern sent from MoDNR Director Pauley to EPA Region 7 Acting Regional Administrator and EPA Headquarters OSWER (now OLEM) Assistant Administrator on July 17, 2015
 - EPA joint response letter of Sept. 28, 2015
 - Hazardous Waste Program (HWP) staff met with EPA Region 7 and other Region 7 States at EPA on November 3, 2015 for further discussion
 - Additional research conducted by the HWP regarding universe of facilities used in the STAG formula, a follow-up response to EPA's Sept. 28, 2015 letter has been drafted and issuance is pending



National STAG Funding Calculation Issues

One EPA Region and 14 states have more facilities listed on the 2020 corrective action baseline than they have in their subject to corrective action universe. Data from RCRAInfo as of Aug. 24, 2015.

	Region 1	Region 2	Region 3	Region 4	Region 5	Region 6	Region 7	Region 8	Region 9	Region 10	National
GPRA 2020 CA Baseline	296	332	579	560	864	423	204	97	333	91	3779
Subject to CA	320	628	409	718	2034	697	375	128	528	140	5977
Ratio % on Baseline	92.50%	52.87%	141.56%	77.99%	42.48%	60.69%	54.40%	75.78%	63.07%	65.00%	63.23%



National STAG Funding Calculation Issues

EPA Region 1		CT	MA	ME	NH	RI	VT	Total
GPRA 2020 CA Baseline		167	49	35	19	19	7	296
Subject to CA		199	57	36	4	15	9	320
Ratio % on Baseline		83.92%	85.96%	97.22%	475.00%	126.67%	77.78%	92.50%

EPA Region 2		NJ	NY	PR	NH			Total
GPRA 2020 CA Baseline		106	174	51	1			332
Subject to CA		271	283	73	1			628
Ratio % on Baseline		39.11%	61.48%	69.86%	100.00%			52.87%

EPA Region 3		DC	DE	MD	PA	VA	WV	Total
GPRA 2020 CA Baseline		2	16	43	355	121	42	579
Subject to CA		1	14	33	163	156	42	409
Ratio % on Baseline		200.00%	114.29%	130.30%	217.79%	77.56%	100.00%	141.56%

EPA Region 4		AL	FL	GA	KY	MS	NC	SC	TN	Total
GPRA 2020 CA Baseline		71	111	77	61	34	90	54	62	560
Subject to CA		147	106	77	125	42	75	60	86	718
Ratio % on Baseline		48.30%	104.72%	100.00%	48.80%	80.95%	120.00%	90.00%	72.09%	77.99%

EPA Region 5		IL	IN	MI	MN	OH	WI	Total
GPRA 2020 CA Baseline		152	121	119	90	254	128	864
Subject to CA		513	402	233	76	680	130	2034
Ratio % on Baseline		29.63%	30.10%	51.07%	118.42%	37.35%	98.46%	42.48%



National STAG Funding Calculation Issues

EPA Region 6		AR	LA	NM	OK	TX		Total
GPRA 2020 CA Baseline		30	64	23	36	270		423
Subject to CA		55	87	26	43	486		697
Ratio % on Baseline		54.55%	73.56%	88.46%	83.72%	55.56%		60.69%

EPA Region 7		IA	KS	MO	NE			Total
GPRA 2020 CA Baseline		52	42	69	41			204
Subject to CA		176	44	93	62			375
Ratio % on Baseline		29.55%	95.45%	74.19%	66.13%			54.40%

EPA Region 8		CO	MT	ND	SD	UT	WY	Total
GPRA 2020 CA Baseline		44	11	8	1	24	9	97
Subject to CA		73	8	7	2	30	8	128
Ratio % on Baseline		60.27%	137.50%	114.29%	50.00%	80.00%	112.50%	75.78%

EPA Region 9		AZ	CA	GU	HI	MP	NV	TT	Total
GPRA 2020 CA Baseline		37	261	5	13	0	15	2	333
Subject to CA		63	425	5	18	1	14	2	528
Ratio % on Baseline		58.73%	61.41%	100.00%	72.22%	0.00%	107.14%	100.00%	63.07%

EPA Region 10		AK	ID	OR	WA			Total
GPRA 2020 CA Baseline		5	12	23	51			91
Subject to CA		20	15	36	69			140
Ratio % on Baseline		25.00%	80.00%	63.89%	73.91%			65.00%



National STAG Funding Calculation Issues

Corrective action facilities on the 2020 baseline that have been deferred (CA210 in RCRAInfo) to other programs (e.g., Superfund) were still included in the baseline facility counts/calculations. Data from RCRAInfo as of Aug. 24, 2015.

	Region 1	Region 2	Region 3	Region 4	Region 5	Region 6	Region 7	Region 8	Region 9	Region 10	National
GPRA 2020 CA Baseline	296	332	579	560	864	423	204	97	333	91	3779
Subject to CA	320	628	409	718	2034	697	375	128	528	140	5977
Ratio % on Baseline	92.50%	52.87%	141.56%	77.99%	42.48%	60.69%	54.40%	75.78%	63.07%	65.00%	63.23%
CA210 Facilities - Total	98	63	79	70	148	58	31	41	111	63	762
CA210 Facilities-2020 Baseline*	15	27	5	18	32	29	6	3	66	11	212
% of CA210s on Baseline	15.31%	42.86%	6.33%	25.71%	21.62%	50.00%	19.35%	7.32%	59.46%	17.46%	27.82%
2020 Baseline Initially Adjusted for CA210s	281	305	574	542	832	394	198	94	267	80	3567

*Statistically the vast majority of the CA210 facilities are designated as "Entire Facility"



National STAG Funding Calculation Issues

Corrective action facilities on the 2020 baseline that have corrective action complete or corrective action process terminated (CA900 and/or CA999 in RCRAInfo) for the entire facility were still included in the baseline facility counts/calculations. Data from RCRAInfo as of Oct. 23, 2015.

	Region 1	Region 2	Region 3	Region 4	Region 5	Region 6	Region 7	Region 8	Region 9	Region 10	National
GPRA 2020 CA Baseline	296	332	579	560	864	423	204	97	333	91	3779
Subject to CA	320	628	409	718	2034	697	375	128	528	140	5977
Ratio % on Baseline	92.50%	52.87%	141.56%	77.99%	42.48%	60.69%	54.40%	75.78%	63.07%	65.00%	63.23%
CA210 Facilities - Total	98	63	79	70	148	58	31	41	111	63	762
CA210 Facilities - 2020 Baseline	15	27	5	18	32	29	6	3	66	11	212
% of CA210s on Baseline	15.31%	42.86%	6.33%	25.71%	21.62%	50.00%	19.35%	7.32%	59.46%	17.46%	27.82%
2020 Baseline Initially Adjusted for CA210s	281	305	574	542	832	394	198	94	267	80	3567
CA999 Facilities - 2020 Baseline	14	68	202	158	282	173	42	58	52	28	1077
CA210/999 Facilities - 2020 Baseline	0	8	0	7	11	16	2	3	5	2	54
CA900 Facilities - 2020 Baseline	3	1	276	31	95	25	8	14	4	1	458
CA210/900 Facilities - 2020 Baseline	0	0	1	2	4	2	0	1	0	0	10
CA900/999 Facilities - 2020 Baseline	1	0	201	9	18	9	1	13	2	0	254
CA210/900/999 Facilities - 2020 Baseline	0	0	0	1	1	2	0	1	0	0	5
2020 Baseline Further Adjusted for CA999	267	237	372	384	550	221	156	36	215	52	2490

*vast majority of above numbers are linked to entire facility



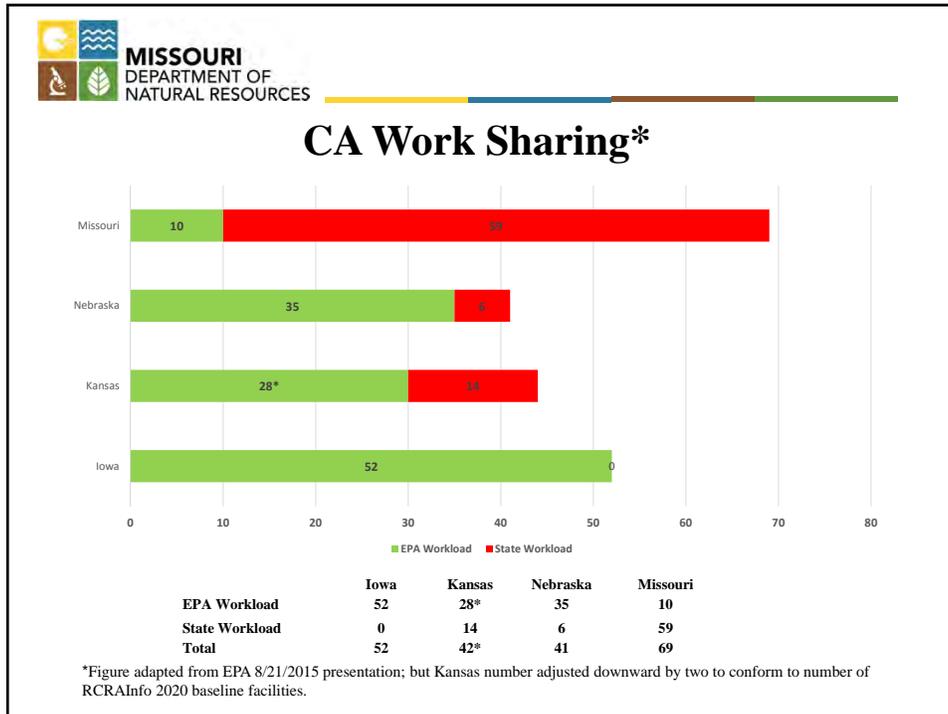
STAG Funding Corrective Action (CA) Workload-Related Questions

- Should facilities on the 2020 CA baseline where the “entire facility” has been deferred (CA210) to other programs (e.g., Superfund) be part of the funding formula since other programs would presumably be funding those activities and there would be little, if any, workload for CA staff?
- Should facilities on the 2020 CA baseline where the corrective action process has been terminated (CA999) for the “entire facility” be part of the funding formula since there would be little, if any, associated CA workload at those facilities?



CA STAG Funding Issues of Significance in Missouri

- CA work on non-2020 baseline facilities is not factored into the formula. Missouri is currently performing and/or planning CA work at facilities that are not on the 2020 baseline prior to the next baseline revision.
- CA Work Sharing (see following graphic)



Permit-related STAG Funding Issues of Significance in Missouri

- Permit related combustion-related activities and workloads have diminished, but not disappeared (e.g. combustion risk assessment work, potential new combustion units at permitted facilities). This comment provided to EPA when the STAG formula ideas previously circulated for comment.
- No consideration of sustainable materials management/recycling component of the program (i.e., many permits address this component and was a comment to EPA when the formula ideas previously circulated for comment.)
- Permit issuance/reissuance and modification workloads



Questions?

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Missouri Hazardous Waste Management Commission Meeting

**April 21, 2016
Agenda Item # 10**

Quarterly Report

Issue:

Presentation of the October through December 2015, Quarterly Report.

Recommended Action:

Information Only.

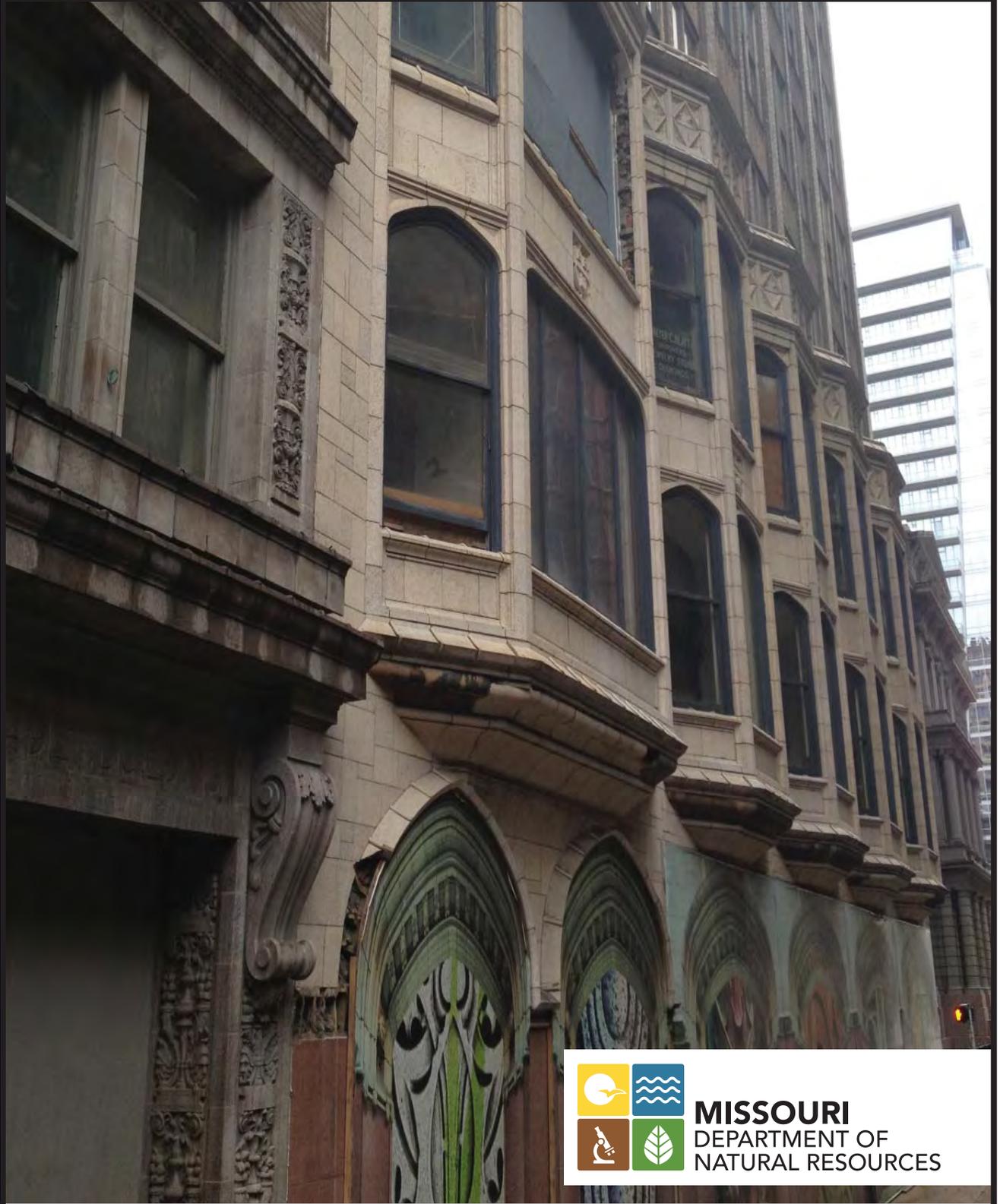
Presented by:

Larry Archer – Public Information, Division of Environmental Quality

Hazardous Waste Management Commission Report

October - December 2015

Quarterly Report



Hazardous Waste Management Commissioners

Charles "Eddie" Adams, Chair

Elizabeth Aull, Vice Chair

Andrew Bracker

James "Jamie" Frakes

Michael Foresman

Mark E. Jordan

"The goal of the Hazardous Waste Program is to protect human health and the environment from threats posed by hazardous waste."

For more information:

Missouri Department of Natural Resources

Hazardous Waste Program

P.O. Box 176, Jefferson City, MO 65102-0176

www.dnr.mo.gov/env/hwp/index.html

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Past issues of the Hazardous Waste Management Commission Report are available online at dnr.mo.gov/env/hwp/commission/quarterlyreport.htm.



Missouri Department of Natural Resources
Hazardous Waste Program

Letter from the Director

Dear Commissioners:

As this quarter closes out 2015, it means the legislative session is right around the corner, and it is time to start the planning for the Fiscal Year 2017 budget. The Budget and Planning Section has been working with the other sections to identify their budget needs and gather information for the department's budget request. The next step in the process will be the release of the governor's recommended budget in January.

This quarter also marks the time where we send out our annual invoicing for generator fees. In November, 2,638 invoices were sent out, totaling \$1,492,256.90 in anticipated revenue. These fees are essential funding for our program, and allow us to meet the matching requirements on several of our federal grants, which are needed to operate the program.

As you are aware, during this quarter, the commission also adopted the Order of Rulemaking for our fee rule package. The changes to the fee structure included in this rule are expected to generate an additional \$500,000 in revenue. This additional revenue is needed to maintain the program's existing operations, as we continue to see decreases in our federal grants in several areas. We appreciate the commission's approval of this rule package, as well as all of the efforts of the stakeholders who assisted us in getting this accomplished.

During this quarter staff have continued to diligently move forward with efforts to prepare for the implementation of the "No Stricter Than" rule provisions. This included training for our hazardous waste inspectors in October. This training included several EPA staff who were also educating themselves on our new requirements, as once we are authorized, they will be doing their inspections based on these new regulations as well.

Staff also held webinars in November and December to provide information to stakeholders. The webinars drew 227 registrants, some with multiple people viewing and/or listening in. In November, the program also participated in the annual REGFORM Seminar. This seminar provided another great forum for the department to reach out to the regulated community on these new requirements.

Additionally, staff continues to update our fact sheets and checklists to reflect these new requirements, both for the benefit of our inspectors and the regulated community. The fact sheets, checklists, webinars and other information can all be found on a new webpage that was specifically developed to help educate interested persons on these new regulatory changes.

We are fortunate to have a dedicated program staff who continue to do their best to protect the citizens and the environment of this great state from the dangers associated with hazardous waste and substances. We hope you enjoy reading about their activities in this addition of the quarterly.

Sincerely,



David J. Lamb
Director

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Brownfields/Voluntary Cleanup Program Certificates of Completion

Brownfields are real property where the expansion, redevelopment or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant or contaminant. Cleaning up and reinvesting in these properties protects the environment, reduces blight and takes development pressures off greenspaces and working lands. Through this program, private parties agree to clean up a contaminated site and are offered some protection from future state and federal enforcement action at the site in the form of a “no further action” letter or “certificate of completion” from the state.

The Brownfields/Voluntary Cleanup Program (BVCP) issued 14 certificates of completion for various sites from October through December 2015. This brings the total number of certificates of completion issued to 783.

Kirksville FMGP – Dental School-Kirksville

The dental school site is located at 118 S. Wabash St. in Kirksville. A.T. Still University planned to construct a new dental school on the site of the Kirksville Former Manufactured Gas Plant. This site was enrolled in BVCP between 1999 and 2005. A.T. Still reenrolled the site in January 2012 to work with BVCP to determine requirements for ensuring the building and site were safe, while also complying with or appropriately modifying the existing covenant.

Construction of a new dental school building was proposed in the area controlled by the prior covenant, which included the footprint of the former manufactured gas plant property (the “core site”) plus a 100-foot buffer zone. Surface and subsurface soil sampling was performed in the proposed building footprint (located in the buffer zone) and elsewhere in the buffer zone. The results indicated soil in the area was not affected by contamination at levels exceeding current 2006 Missouri Risk Based Corrective Action (MRBCA) risk-based target levels (RBTLs) for unrestricted/residential land use. The department approved construction of the proposed building, and the buffer zone no longer requires activity and use limitations with regard to soil.

Surface and subsurface soil sampling was performed on the core site to further define the extent of previously detected shallow soil contamination exceeding non-residential RBTLs. The chemicals of concern in the soil included semi-volatile organic compounds, primarily naphthalene and benzo(a)pyrene. Soil was excavated from the core site to a depth of three to five feet below grade. A total of 2,780 tons of soil was disposed at a permitted landfill. Residual contamination in surface and subsurface soil in the core site meets non-residential target levels. The department determined the site is safe for its intended use.

Pruitt-Igoe Parcels 1, 2, and 3--St. Louis

The Pruitt-Igoe Housing Project Parcels 1, 2 and 3, are located at 2300 Cass Ave. in St. Louis. This 34.45-acre property has been developed since the late 1800s as residential, commercial and industrial properties. Previous operations at the Pruitt-Igoe site included: a service station, auto repair facilities, chemical companies, a dry cleaner, a battery manufacturer, iron and steel companies, junkyards, a die-casting company, an electric manufacturing company, a lawn mower manufacturer, a shoe factory and a bottling facility. The Pruitt-Igoe housing complex, constructed at the site in the 1950s, was demolished in the early 1970s. The site has remained vacant since then and was covered with fill and debris.

Site investigations showed the main constituents of concern in soil and groundwater were metals, polycyclic aromatic hydrocarbons (PAHs), benzene and total petroleum hydrocarbons gasoline-range organics (TPH-GRO). A risk assessment in accordance with the 2006 MRBCA Guidance was conducted. No contaminants were found in groundwater above MRBCA residential use standards, although the detection limits of some laboratory samples were above drinking water standards. In surface soil, metals

and PAHs exceed the standards for residential use, but not non-residential use. An environmental covenant was implemented to restrict use of the site to non-residential use.

One area of the site has levels of lead that may pose a risk to construction workers. A Soil Management Plan is included in the environmental covenant to govern soil handling during construction activities. The property is being redeveloped to return the site to active use, which has not occurred since the Pruitt-Igoe housing was demolished in the early 1970's. The department determined the site is safe for its intended use.

Ennis Paint-Cuba

The Ennis Paint (former) site located at 102 Commerce Drive in Cuba is a 3.5-acre property with two buildings: a 12,000-square-foot main building and a 1,320-square-foot garage. The facility began operations as a paint and coatings manufacturing facility in 1989, ceasing its operation in 2005. In 2013, the U.S. Environmental Protection Agency (EPA) oversaw the voluntary removal of paint and paint-related wastes from the property, including materials categorized as hazardous waste, which was completed to the EPA's satisfaction.



Site characterization data indicated heavy metals and volatile organic compounds (VOCs) were detected in soil at the site. However, a risk assessment conducted in accordance with the MRBCA determined none of the concentrations detected exceeded the appropriate RBTLs. Shallow groundwater was not encountered at the site during site characterization activities. Based on the results of the site characterization activities, the site meets the criteria for unrestricted land use. The department determined the site is safe for its intended use.

Future use of the property is anticipated to be industrial/manufacturing.

Midwest Block & Brick/Midwest Cement Company-Jefferson City

The Midwest Block & Brick site is located at 164 Katy Road in Jefferson City. The former Spectraglaze facility was an operation where glazing was applied to concrete block for use in architectural landscaping applications. Heat from a fire at the plant in 1999 caused expansion of contents inside a 55-gallon drum of trichloroethene (TCE). The pressure release valve on the drum allowed the release of TCE to the subsurface on the south side of the production building. A removal operation was conducted, with highly impacted soils being removed and properly disposed. Several monitoring wells were installed to characterize and monitor groundwater impacts. Monitoring showed groundwater was impacted and the plume had spread.

Following several years of monitoring the groundwater plume, it was determined site conditions were not conducive to adequately attenuate chlorinated solvents with some of the source remaining in the release area. A remedial action plan was approved to conduct enhanced bioremediation by injecting Hydrogen Release Compound and microbes at the release area. This injection was done in April 2009 and groundwater monitoring continued, showing concentrations of contaminants decreased. A analysis of contaminant degradation and plume stability, and a risk assessment in accordance with the 2006 MRBCA guidance was conducted. The conclusion was the likelihood of risk to off-site receptors was minimal, but on-site contamination posed a possible risk through the domestic use of groundwater. This risk will be

managed by an environmental covenant prohibiting the use of contaminated groundwater beneath the site. It also prohibits drilling for other purposes that could spread the contamination to deeper aquifers. The department determined that the site is safe for its intended use.

The property will continue to be used in the manufacture of masonry and landscape products.

Harrison Education Center-St. Louis

The Harrison Education Center site is located at 3140 Cass Ave. in St. Louis. This is a four-acre vacant site that will be developed as an education center. The site was previously utilized as a gas station, dry cleaner and sheet metal works facility. Phase I and II investigations were performed and found lead and PAHs in surficial soil and naphthalene in groundwater.

Initial investigation identified soil and groundwater contaminants at concentrations exceeding MRBCA default target levels (DTLs). Lead and PAHs were present in surface urban fill and groundwater. After further site characterization, a risk assessment indicated PAHs in surface soil were above non-residential MRBCA RBTLs for ingestion, inhalation and dermal contact; benzene and TPH-GRO exceeded non-residential RBTLs for indoor inhalation and posed a risk to the proposed building; and a lead hot spot exceedance in the subsurface soil of non-residential MRBCA RBTLs. Subsequent remedial actions included: excavation of two lead hot spots, placement of a vapor barrier under the eastern portion of the building and placement of an engineered barrier (pavement or soil cap) over a portion of the site. During the excavation of one of the hot spots, two underground storage tanks (USTs) were encountered. One UST was removed and one was closed in place due to its location beneath an existing sidewalk. The final risk assessment (conducted using MRBCA 2006) indicated there were no exceedances of non-residential RBTLs. An environmental covenant with attached management plan was filed in the property chain of title. The department determined the site is safe for its intended use.

HCI Properties LLC-Kansas City

The HCI Properties LLC site is located at 3100 Prospect Ave. in Kansas City. The half-acre site consists of an asphalt parking lot and a single story 2,380-square-foot structure. The site has served as a Popeye's fast food restaurant from 1987 to present. Previously, the site served as part of the St. Joseph's Hospital Complex from 1917 to the 1970s. Historical records show the northeast corner of the site served as a gas station from the 1940s-50s. A 2013 Phase II subsurface investigation revealed petroleum related contamination in soil and groundwater on the northeast portions of the site.

Site investigations revealed the presence of lead impact to soil and gasoline range organic (GRO) impact to groundwater related to past site use as a gas station. Historical aerial photos indicated the presence of several above ground storage tanks (ASTs) on the northeast portion of the property. A limited Phase II was conducted in 2013 to evaluate soil and groundwater in the area of the former gas station. Benzene, naphthalene, toluene and 1,2-dibromoethane were detected in groundwater above DTLs. Additional sampling was conducted in 2014 along with the installation of three monitoring wells to evaluate contaminant plume stability. A tier 1 risk assessment and hydraulic conductivity study were conducted according to the 2006 MRBCA guidance. The assessment found the domestic use pathway to be incomplete on site due to insufficient groundwater production. Vapor intrusion pathways were determined to be complete due to the existence of an active restaurant on the site. Further evaluation of groundwater contamination against 2006 MRBCA vapor intrusion target levels indicated contamination is present within safe levels for residential use. Lead impact to soil was also found to be below target levels for residential use. The department determined the site is safe for its intended use.

Arcade Building-St. Louis

The Arcade Building site located at 800-814 Olive St. in St. Louis is an eight-tenths of an acre site including two interconnected high-rise buildings: the 18-story Wright Building and the 16-story Arcade Building. The buildings have 453,305 square feet of above-grade floor area. The site entered into the BVCP for cleanup of asbestos containing material (ACM), lead-based paint (LBP), Freon, possible hydraulic oil, possible ink and solvent associated with a former printing operation and other miscellaneous hazardous substances and petroleum products throughout the building.

Previous inspections identified the presence of LBP, ACM and various types of household-hazardous waste throughout the site. LBP was primarily located on window components, wood flooring, plaster walls and ceilings, and stairwell railings. ACM was found in roof flashing, window caulk, various insulations, tile and adhesive glue pucks. Household hazardous waste was found throughout the building in the form of light ballasts, florescent bulbs, exit signs, thermostats, etc.

All ACM was abated by removal from the site and properly disposed, and all household-hazardous waste was removed and properly disposed. The majority of LBP was addressed by structural demolition or component removal. Limited amounts of LBP in stairwells, on structural columns, historical ceilings and walls underwent wet scraping and encapsulation; these areas will remain in place under an operation and maintenance (O&M) plan. All LBP waste generated during site activities was properly disposed. The department determined the site is safe for its intended use.



Winchell’s Donut House (former)-Kansas City

The Winchell’s Donut House (former) site is located at 626 E. 63rd. St. in Kansas City. The one-half acre site was historically divided into three lots known as Lots 1, 2 and 3. Lots 1 and 2 were developed in the 1930s with a gasoline filling station, including four gasoline tanks which operated through the late 1970s. Lot 3 was first developed as a drycleaner in the 1940s that continued operating in the early 1980s. Lot 3 was redeveloped in the 1980s as a Winchell’s Donut House and operated through 1994. All buildings on the site were demolished in late 1999 and the property was paved over for parking. Currently the site is being redeveloped into multi-family housing.

Soil borings were advanced on-site to determine the presence of contaminants related to dry cleaning operations and the former filling stations. Chemical analysis of soil and groundwater samples revealed the presence of residual gasoline impact on the southwest section of the property. No residual dry cleaner impact to the site was found.

Approximately 103 tons of contaminated soil was excavated from the southwest section of the property. In order to confirm the removal of contaminated soil, samples were collected and chemically analyzed. The results show that concentrations of contaminants were either not detect or below the 2006 MRBCA DTLs. The department determined the site is safe for its intended use.

Post Office Redevelopment-St. Charles

The Post Office Redevelopment site located at 119 S. Main St. in St. Charles. The site is occupied by a vacant post office building built circa 1908. The site has previously served as a plumbing service, real estate offices and residential spaces. Lead based paint and asbestos containing materials were suspected throughout the site.

Investigations revealed the presence of LBP, ACM and various types of household hazardous waste throughout the building. LBP was primarily located on interior walls as well as interior and exterior window components. Asbestos was found in floor tile, ceiling tile and thermal system insulation throughout the first and second floors. A small amount of ACM was identified in roof materials. Household hazardous waste was primarily comprised of light ballasts along with florescent bulbs, thermostats and assorted household chemicals.

All ACM was abated by removal from the site. LBP was abated through wet scraping or component removal. Limited amounts of LBP were encapsulated and will remain on site under an O&M plan. Florescent lamps and ballasts and all remaining hazardous waste and abatement debris were properly disposed. The department determined the site is safe for its intended use.

Energizer Battery Manufacturing Inc.-Maryville



Energizer opened the Energizer Battery Manufacturing Inc. site, located at 3131 E. First St. in Maryville, in 1971, for the production of AA, C and 9-volt batteries. The plant expanded from 132,000 square feet to 507,000 square feet in size. TCE was used to degrease cans and other parts from 1971 to 1997. It was also used as a carrier to apply sealant to some other cell types. A site assessment revealed low levels of TCE in the soil under the southeast corner of the production building. A groundwater investigation revealed TCE at levels above the EPA's maximum contaminant levels at the southeast corner of the property.

After delineation of TCE in the soil and groundwater, two in situ chemical oxidation injection events were conducted in the early 2000s to remediate the contamination. Groundwater monitoring since then has demonstrated a significant decrease in the concentrations of TCE, and the plume itself continues to decrease in area and concentration. The onsite cooling tower water wells have been properly closed, as their use had caused the contamination to migrate. An environmental covenant is being used to restrict the use of the site to non-residential land use and to prohibit the installation of groundwater wells. The department determined the site is safe for its intended use.

Fulton State Hospital-Fulton

The Fulton State Hospital site is located at 600 E. Fifth St. in Fulton. This site is part of the Fulton State Hospital complex and consists of a former aboveground storage tank (AST) farm consisting of eight 18,000-gallon ASTs. The ASTs contained gasoline and diesel for on-site power generation and vehicle fueling.

Red diesel fuel released from a leaking pipe from the AST farm at the site infiltrated a storm sewer and contaminated a stormwater drainageway at the southern end of the site. Emergency response activities were conducted and successfully remediated the storm sewer and drainageway. The ASTs

were subsequently removed, and additional site characterization was conducted and indicated elevated concentrations of both gasoline and diesel in the soil and groundwater around the former AST farm. Remediation was conducted in accordance with an approved remedial action plan, including excavation of contaminated soil, recovery and removal of contaminated groundwater, and quarterly groundwater monitoring. After completion of remediation and groundwater monitoring, a risk assessment conducted in accordance with the 2006 MRBCA guidance indicated that the contamination was successfully remediated, and that the remaining contaminant concentrations in soil and groundwater meet cleanup criteria for unrestricted land use. The department determined the site is safe for its intended use.

The site will remain part of the Fulton State Hospital property. Construction is planned in the area for expansion and improvement of the hospital’s housing units.

Sites in Brownfields/Voluntary Cleanup Program

Month	Active	Completed	Total
October 2015	229	778	1007
November 2015	228	781	1009
December 2015	229	783	1012

New Sites Received: 7

October

Elpaco Coatings Corp., St. Louis
 Liberty Commons, Liberty

November

Crestwood Court, Crestwood
 Square Creek National Wildlife Refuge, Mound City

December

Tip Top Cleaners (former), St. Louis
 Optimist Club (former), St. Louis
 Calico Labs (former), Festus

Sites Closed: 14

October

Kirksville FMGP -- Dental School, Kirksville
 Pruitt-Igoe Housing Project Parcel 1, St. Louis
 Midwest Block & Brick, Jefferson City
 Harrison Education Center, St. Louis
 Ennis Paint (former), Cuba
 Winchell’s Donut House (former), Kansas City
 Pruitt-Igoe Housing Project Parcel 2, St. Louis
 Pruitt-Igoe Housing Project Parcel 3, St. Louis
 Midwest Cement Co., Jefferson City

November

Arcade Building, St. Louis
 Post Office Redevelopment, St. Charles
 HCI Properties LLC, Kansas City

December

Energizer Battery Manufacturing Inc., Maryville
 Fulton State Hospital, Fulton

Drycleaning Environmental Response Trust Fund

The Department of Natural Resources' Drycleaning Environmental Response Trust (DERT) Fund provides funding for the investigation, assessment and cleanup of releases of chlorinated solvents from drycleaning facilities. The two main sources of revenue for the fund are the drycleaning facility annual registration surcharge and the quarterly solvent surcharge.

Registrations

The registration surcharges are due by April 1 of each calendar year for solvent used during the previous calendar year. The solvent surcharges are due 30 days after each quarterly reporting period.

Calendar Year 2015	Active Drycleaning Facilities	Facilities Paid	Facilities in Compliance
January - March 2015	134	62	46.27%
April - June 2015	134	113	84.33%
July-September 2015	134	118	88.06%
October-December 2015	134	119	88.81%

Calendar Year 2015	Active Solvent Suppliers	Suppliers Paid	Suppliers in Compliance
January - March 2015	11	9	81.82%
April - June 2015	11	8	72.73%
July-September 2015	11	10	90.91%
October-December 2015	11	8	72.73%

Cleanup Oversight

Calendar Year 2015	Active Sites	Completed Sites	Total
January - March 2015	20	15	35
April - June 2015	20	15	35
July-September 2015	19	16	35
October-December 2015	19	16	35

New Sites Received: 0

Sites Closed: 0

Reimbursement Claims

The applicant may submit a reimbursement claim after all work approved in the work plan is complete and the DERT Fund project manager has reviewed and approved the final completion report for that work. The DERT Fund applicant is liable for the first \$25,000 of corrective action costs incurred. During this quarter, no claims were received, reviewed or processed.

Total reimbursements as of Dec. 31, 2015: \$2,784,107.05

DERT Fund Balance as of Dec. 31, 2015: \$327,121.91

2015 - A Year in Review

Each year, the Permits Section coordinates with the U.S. Environmental Protection Agency (EPA) to prioritize activities at hazardous waste facilities subject to the section's oversight. Together, the section and EPA agree on general activity goals. The Performance Partnership Grant Work Plan, an overarching plan that covers the department's air, water and hazardous waste programs, lists the section's general activity goals. The Permits Section and EPA's hazardous waste staff also agree to specific current and future goals, which are contained in a related document called the Multi-Year Facility Planning Strategy. Together these two documents guide the section in planning resources and performing activities for the current and future federal fiscal years (FFY).

The Multi-Year Facility Planning Strategy includes goals the section and EPA anticipate accomplishing if all staff positions are filled and all projects go relatively smoothly. The Multi-Year Facility Planning Strategy is a "living" document. Projected tasks and project completion dates are routinely updated for a variety of reasons, such as staff turnover and resources, facility bankruptcy, permit appeals, corrective action dispute resolution, investigation findings leading to additional work, public comments and intervening short-term priorities. The section routinely updates EPA about the status of the section's goals based on the most recent information available and coordinates new projected completion dates with EPA for any delayed goals.

At the end of each FFY, the section prepares a report for EPA, documenting progress on all planned and unplanned activities during that fiscal year. The report focuses mainly on permitting, corrective action, and groundwater inspection and evaluation activities. The following summary information is from the 2015 FFY report, which summarizes activities from Oct. 1, 2014 through Sept. 30, 2015.

Hazardous Waste Permitting Activities

The section coordinated, both internally and with EPA, on the priority of individual projects and tasks as dictated by the National Corrective Action Prioritization System and Overall Priority Ranking System ranking for each facility, as well as goals established by the federal Government Performance and Results Act of 1993 (GPRA). Facility rankings are occasionally adjusted to reflect current environmental and section/EPA project priorities. During 2015, the section did not adjust any facility rankings, but did adjust certain priorities in response to the GPRA goals and the needs of the regulated facilities.

During FFY 2015, clean closure certification was accepted for all remaining regulated units at the University of Missouri - Columbia. No post-closure care was required. The following permitting related activities were also completed:

- One permit renewal: Missouri Pressed Metals (post-closure/corrective action)
- Seven class 2 permit modifications: one to AK Steel, Bayer CropScience, EBV Explosives Environmental, Exide Technologies and Solvent Recovery LLC and two to Doe Run Co.
- 12 class 1 permit modifications with prior director approval
- One class 1 permit modification with prior director approval - denied
- Five class 1 permit modifications without prior director approval
- One temporary authorization issued to BASF to approve the transfer of aqueous waste generated by the production of Chlorfenapyr insecticide at the Pyrrole facility to the South Incineration area ("D" incinerator) for treatment

During FFY 2015, the section completed two closures and made progress on the issuance of 16 hazardous waste management facility permits. Though not complete, the section is also working on the following permitting-related activities:

- Five class 3 permit modification requests
- Three class 2 permit modification requests
- 20 class 1 permit modification with prior director approval
- Seven class 1 permit modification without prior director approval

Corrective Action Activities

During FFY 2015, progress was made on many corrective action activities related to site investigation, monitoring and remediation. These activities are too numerous to list here in their entirety, but following are some of the highlights.

During FFY 2015, the section continued to work closely with EPA in an effort to improve the national Resource Conservation and Recovery Act (RCRA) corrective action process through the development of its corrective action Project LEAN framework, now called RCRA Facility Investigation Remedy Selection Track (RCRA FIRST). The section worked with EPA to develop a RCRA FIRST “Tool Box,” which represents a collection of principles and approaches focusing on identifying and eliminating non-value added activities in the corrective action process. EPA and selected states, including Missouri, are currently applying the RCRA FIRST concepts to the corrective action process at several facilities in order to identify and eliminate process inefficiencies, barriers to progress and reduce costs without compromising human health and the environment. The facilities where the RCRA FIRST concepts are currently being applied include the former Zenith facility in Springfield, the Omnium facility in St. Joseph and former Amoco (now BP) Sugar Creek refinery in Kansas City. The RCRA FIRST Tool Box will reportedly be made available on a national basis through posting on the internet sometime during FFY 2016.

EPA and the states developed the Environmental Indicator evaluation process together as a way to show progress in protecting human health and the environment and meet the performance and results objectives. The two environmental indicators are “Current Human Exposures Under Control” and “Migration of Contaminated Groundwater Under Control.” These indicators evaluate current environmental conditions, whether people are currently being exposed to environmental contamination at unacceptable levels and whether any existing plumes of contaminated groundwater are expanding, stable or shrinking.

During FFY 2015, the section, in coordination with EPA, completed four Environmental Indicator evaluations: two for the University of Missouri - Columbia and two for Hazmat - Kansas City. At both facilities, human exposures to contamination and contaminated groundwater migration were determined to be under control. The number of facilities with human exposures controlled is currently a cumulative total of 55 of 69 GPRA 2020 baseline facilities thru FFY 2015. The number of facilities with migration of contaminated groundwater controlled is currently a cumulative total of 52 of 69 GPRA 2020 baseline facilities thru FFY 2015. More information regarding the overall nature and scope of the environmental indicator evaluations is available in the 2007 Fourth Quarter Hazardous Waste Management Commission Report, located online at www.dnr.mo.gov/env/hwp/commission/reports/2007-4th.pdf.

During FFY 2015, the department did not impose any new agency-mandated interim measures on facilities; however, facility-proposed measures were reviewed and approved for the closed BFI Missouri City landfill. The section approved other work plans and reports for incremental/phased work done in support of longer-term corrective action investigation and cleanup goals at several facilities. A final remedy decision, another performance and results goal, for Chemical Recovery Corp. – Kansas City was also completed this fiscal year. Final remedy construction, a high-priority national performance and

results goal was completed at Nexeo Solutions – St. Louis and Chemical Recovery Corp. – Kansas City. The number of facilities with final remedy construction is currently a cumulative total of 38 of 69 GPRA 2020 baseline facilities thru FFY 2015. One additional national performance and results goal, corrective action performance standards attained with controls, was achieved in FFY 2015 for Chemical Recovery Corp. – Kansas City. The number of facilities with corrective action performance standards attained is currently a cumulative total of 16 of 69 GPRA 2020 baseline facilities thru FFY 2015. One additional corrective action performance standard attained determination for Safety-Kleen Springfield was in process at the end of FFY 2015, but was not yet complete.

Together, EPA and the states previously developed a format for facility Ready for Anticipated Use (RAU) determinations to show environmental progress at facilities. EPA requested incorporation of RAU documentation of preparation goals in the current Performance Partnership Grant Agreement. The commitment to prepare RAU documentation at appropriate times was included in the Performance Partnership Grant Work Plan, but not the Multi-Year Facility Planning Strategy. The section continues to track RAU status and prepare RAU documentation for facilities during the corrective action process. The RAU determinations are one of several ongoing EPA initiatives that are essentially unfunded federal mandates. During FFY 2015, the section completed RAU determinations for Chemical Recovery Corp. – Kansas City and Hazmat - Kansas City.

Groundwater Activities

As part of the Performance Partnership Grant Work Plan, the state negotiates preparation of groundwater evaluations at selected hazardous waste facilities with EPA. These evaluations are conducted at post-closure and corrective action facilities with active groundwater monitoring programs and facilities with active and closed land disposal units, such as landfills and surface impoundments, where groundwater contamination is present or needs monitoring to detect releases. Evaluations come in two forms, the comprehensive groundwater monitoring evaluation (CME) and the operation and maintenance (O&M) inspection. The CME is an overarching evaluation of the facility's groundwater monitoring systems and programs. The O&M inspections, periodically performed as a follow-up to the CME, are focused on examining groundwater sampling plans, procedures and monitoring well maintenance issues. In each case, the section assesses compliance with the applicable groundwater monitoring regulations and permit or order conditions.

The section continues to coordinate these evaluations with the department's Missouri Geological Survey (MGS) and Environmental Services Program (ESP). Five O&M reports are typically scheduled for each FFY. All fieldwork for the five O&M reports scheduled for FFY 2015 was completed; however, the associated reports were not all finalized during the federal fiscal year. In FFY 2015, the section carried out advanced planning for O&M reports scheduled for completion in FFY 2016. Following a review and selection of the facilities and appropriate wells for sampling, work plans were developed with ESP and MGS for these five facilities.

In addition to O&M reports and CMEs, the section routinely performs a detailed review of groundwater monitoring reports submitted by the facilities, using an internal checklist. These reviews identify both minor and potentially significant deficiencies with report content or project issues. The section sends significant issues that might influence the representative nature of groundwater samples, data validity, regulatory compliance or project progress, to the facility when discovered, rather than waiting until the next O&M report or CME. Regulatory compliance issues of major concern are handled promptly through appropriate enforcement actions. During FFY 2015, the section completed six groundwater monitoring report reviews.

Financial Assurance Activities

The section monitors the permitted facilities' financial health throughout the year and conducts annual financial assurance reviews to make sure enough funding is available to cover the cost estimates for their activities. During FFY 2015, the section conducted 99 RCRA financial reviews. This number includes three resource recovery financial assurance reviews, of which all are TSD facilities.

Other Activities

The Multi-Year Facility Planning Strategy document does not capture the many "unplanned" activities that come about during the year, including facility-proposed permit modifications; incremental/phased work done in support of the listed Multi-Year Facility Planning Strategy goals; facility-proposed interim measures; newly-identified Solid Waste Management Unit and Area of Concern investigations; financial reviews, public notice and outreach activities; ongoing involvement in national permitting and corrective action initiatives; and state resource recovery certification and modification activities. The section substitutes completion of some unplanned work for equivalent planned work, to address federal grant requirements for formal Multi-Year Facility Planning Strategy goals unable to be completed as planned.

During FFY 2015, the section provided technical support to other Hazardous Waste Program sections and the Division of Environmental Quality on several occasions, regarding multiple sites and issues. Tasks included activities such as document review and site characterization, conceptual model, plume stability, monitoring system adequacy, remedy design, groundwater data interpretation and natural resource damage evaluation.

Considerable time and resources were spent on several activities related to the DOE/GSA Bannister Federal Complex. Activities included weekly issues reports, weekly EPA/state technical staff teleconferences, monthly EPA/state/permittee/redeveloper meetings and numerous website updates to make various documents available to the public. In the time since the entire federal complex was brought under the permit, additional time has been spent reviewing and approving documents required by the permit modification compliance schedule, including a revised sampling and analysis plan; updated long-term operation, maintenance and monitoring plan; updated spill control/emergency plan, baseline risk assessment and a Polychlorinated Biphenyl (PCB) Fate and Transport Study Work Plan. The section has also spent additional time reviewing and approving multiple work plans and reports prepared by the preferred redevelopment partner, CenterPoint, and their consultants as part of their "due diligence" efforts aimed at future redevelopment of the federal complex.

Time and resources have also been spent following up on facility bankruptcy issues. Tasks included review, approval and reconciliation of proposed expenditures of trust fund monies recovered during bankruptcy proceedings to perform facility maintenance and monitoring. Section staff also provided post-bankruptcy information and technical support to department managers, legal staff, EPA and the Missouri Attorney General's office regarding bankruptcy-related issues. These issues were related to the following companies:

- City Environmental Inc. - Kansas City
- The Doe Run Co. Glover Smelter - Annapolis
- Greenfield Environmental Trust LLC (formerly Tronox) - Kansas City
- Greenfield Environmental Trust LLC (formerly Tronox) - Springfield
- Omnium LLC - St. Joseph
- West Star Environmental Inc. - Kingsville

The section provided substantial technical support to the department's Natural Resource Damage (NRD) efforts. Two staff are assigned NRD assistance duties on a part-time basis to perform NRD related tasks for several sites, in addition to performing core section functions. Tasks have periodically included reviewing reports, participating in scoping meetings, participating in monthly technical conference calls, public meetings, creating geographic information system based maps and preparing habitat equivalency analyses and damage claims.

During FFY 2015, the section worked with EPA headquarters to assess workloads associated with permit modifications and took steps to communicate the importance of permit modification work to EPA upper management and federal budget decision-makers. Staff helped collect examples of beneficial permit modification work as part of EPA's RCRA messaging initiative. They also participated in discussions and made recommendations regarding RCRAInfo redesign related to permit modifications, making permit modification data entry into RCRAInfo mandatory, so states get national credit for permit modification work and support for continued RCRA program funding on the national level. These efforts helped EPA headquarters develop a report titled Permit Modifications Report: Safeguarding the Environment in the Face of Changing Business Needs, EPA 530-R-15-001, January 2016. The report was recently posted on EPA's website, located at <http://nepis.epa.gov/Exe/ZyPURL.cgi?Dockey=P100O0MR.txt>. Staff provided several permit modification case history examples to EPA as part of development of this report, some of which are included in the final report version.

Staff continued to routinely participate in state and national work groups and teleconferences, including:

- EPA Groundwater Forum
- EPA RCRA Permit Modification Work Group
- State "No Stricter Than" Hazardous Rulemaking Work Group
- National Corrective Action Project LEAN Work Group
- RCRA Financial Assurance Work Group
- Monthly RCRA Permit Writers Teleconferences
- Monthly RCRA Combustion Teleconferences
- Monthly RCRA Reuse and Brownfields Prevention Teleconferences
- Monthly RCRA/TSCA Remediation Teleconferences
- Monthly RCRA Subpart X Teleconferences
- RCRAInfo Change Management Process Financial Assurance Expert and Corrective Action Work Groups
- RCRAInfo Data Work Group

Permit Modifications List Available Online

Facilities or businesses actively treating, storing (for longer than allowed by the hazardous waste generator regulations) or disposing of hazardous waste in Missouri must get a hazardous waste permit. These permits contain hazardous waste management operating and closure requirements for facilities that are actively managing hazardous waste. If applicable, the permits also contain post-closure, corrective action and financial assurance requirements for facilities with previously closed hazardous waste management units that require continuing care for facilities with demonstrated releases to the environment.

The department or the facility can make changes to the hazardous waste permit throughout its life. The regulations identify facility-initiated permit modifications as Class 1, 2 or 3, depending on how much they change the original permit conditions. The regulations do not break down department-initiated permit modifications by class. The department is notifying the public of all hazardous waste permit modifications processed by Missouri for calendar year 2015. The permit modification list for calendar year 2015 (and previous years) is available online at www.dnr.mo.gov/env/hwp/permits/publications.htm.

Regional Office Hazardous Waste Compliance Efforts

- Conducted 105 hazardous waste generator compliance inspections:
 - 17 at large quantity generators
 - 50 at small quantity generators
 - 24 at conditionally exempt small quantity generators
 - Five at E-waste recycling facilities
 - One at resource recovery facilities
 - One targeted reinspection
 - Five focused compliance inspections
 - Five E-waste inspections
- Conducted two compliance assistance visits at hazardous waste generators
- Issued 29 letters of warning and eight notices of violation requiring actions to correct violations cited during the 105 inspections conducted
- Received and investigated a total of 41 citizen concerns regarding hazardous waste issues

Underground Storage Tank (UST) Compliance and Technology Unit (CTU)

Tank inspection contract – During the reporting period, the tank inspection contractor conducted 303 inspections of active underground and aboveground storage tanks for the Missouri Department of Natural Resources and the Missouri Petroleum Storage Tank Insurance Fund.

Operator training – Operator training is now available online. Class A/B operator training and Class C operator training are both available, as well as a “test only” option. The draft rule is also available online, which includes a compliance deadline of July 1, 2016. The department and the insurance fund will also be accepting reciprocity from some of our neighboring states. The training program and draft rule may be found on the fund’s webpage: <http://optraining.pstif.org/intro/>.

Federal rule changes – In 2011, EPA proposed significant changes to the UST regulations. The final version of those rules was published in July and became effective Oct. 13, 2015. Please note, these rules are not yet effective in Missouri; they will not be effective in Missouri until the department promulgates Missouri’s regulations or until EPA follows its procedures for withdrawal of our state program approval. The rule includes new testing requirements for release detection equipment; overfill prevention equipment (e.g., flapper valves, ball float valves and alarms), spill buckets and containment sumps. Previously deferred airport fuel hydrant systems and field constructed tanks will now be regulated. Missouri must also include a new requirement for all new systems installed after July 1, 2017, to be double walled with enhanced leak monitoring. For updates and information on these upcoming rule changes, please visit our webpage: <http://dnr.mo.gov/env/hwp/ustchanges.htm>.

Tank inspections – State Fiscal Year 2016 contract inspections, as well as the department inspections continue. As seen in previous years, Missouri owners, operators and contractors continue to demonstrate their proactive compliance by being responsive to issues when found, demonstrating a willingness to be a partner in ensuring all Missouri USTs are in compliance. The department is maintaining compliance with the EPA requirement of inspecting all regulated facilities at least every three years. The department must also demonstrate all facilities are either in compliance or are moving to gain compliance. This goal is much easier to accomplish when owners, operators, contractors and regulators are all working together.

Financial Responsibility - Efforts continue to resolve violations with facilities not maintaining a financial responsibility mechanism to address releases and to protect third parties. Because of these efforts by the UST Compliance Technology Unit staff and the Attorney General's Office, the number of facilities without a verified financial responsibility mechanism is less than 1.5 percent.

Special Facilities Unit

Commercial facility inspectors - Special facilities inspectors conducted seven inspections of commercial hazardous waste treatment, storage and disposal facilities (TSDFs).

Polychlorinated biphenyl (PCB) inspector - The inspector conducted 12 compliance inspections at various types of facilities throughout the state. The inspector's reports are forwarded to the U.S. EPA Region 7, which has authority for taking any necessary enforcement action regarding PCBs according to the Toxic Substances Control Act.

Hazardous waste transporters - 90 Hazardous Waste Transporter License compliance background checks were completed. In addition, staff updated Missouri's List of Licensed Hazardous Waste Transporters and added a key to services. The list includes transporters licensed to haul hazardous waste, infectious waste and used oil in Missouri and it can be accessed at <http://dnr.mo.gov/env/hwp/transporters.php>.

Hazardous Waste Enforcement Unit

Enforcement Efforts

- Resolved four hazardous waste enforcement cases.
- Received two new enforcement cases.

Hazmat, Incorporated

Hazmat is a commercial hazardous waste treatment, storage and disposal facility located in Kansas City. The department conducted inspections of Hazmat on Feb. 14, 2013; April 16, 2013; and Jan. 30, 2014. The department issued four notices of violation which included violations of the containerization and storage requirements and violations of the universal waste requirements. All violations were corrected and the department and Hazmat negotiated a penalty of \$11,000 to be paid in one installment to the Jackson County School Fund. An administrative order on consent was finalized and sent to the company on Nov. 5, 2015.

Bill Crawford

The department conducted a complaint investigation on Mr. Crawford's property, located at 3911 North Highway 67, Poplar Bluff, on Jan. 30, 2014. Bluff Honda formerly operated at the facility for approximately 13 years. During the investigation, the department observed used oil released to the environment in violation of the Missouri Hazardous Waste Management Laws and Regulations. On Feb. 13, 2014, the department issued a notice of violation to Mr. Crawford for these violations. By March 3, 2014, Mr. Crawford demonstrated he adequately addressed each of these violations.

Mr. Crawford signed an administrative order on consent and paid a one-time civil penalty and agreed to refrain from violations for all future inspections. The penalty was paid up-front. The \$1,000 penalty was paid to the Butler County School Fund.

Federal International Inc.

Federal International Inc., Jefferson City, receives recyclable materials from the public directly, as well as through several business and government contracts. Federal sorts the materials and sells them to downstream vendors. Materials collected include ferrous and nonferrous metals, plastics, paper, cardboard and electronics.

The department conducted an inspection of Federal on June 11, 2013, during which it was determined Federal had mismanaged at least 198 cathode ray tubes (CRTs) resulting in violations of the Missouri Hazardous Waste Management Law and Regulations.

The department issued a notice of violation to document these violations. Federal had returned to compliance by Nov. 22, 2013, having adequately addressed the violations. The company agreed to amicably resolve all claims the department might bring against the company by signing an administrative order on consent. A penalty amount of \$4,800 was paid by the company, with \$3,200 suspended if there are no further violations for two years. The penalty is being paid to the Cole County School Fund.

Harmon Transport Inc. and Diesel Shop

The department conducted an investigation of Harmon Transport Inc. and Diesel Shop in Cabool on Oct. 2, 2013. The investigation focused on management of used oil at the facility. The inspector observed approximately 27 55-gallon drums of used oil and five small drums of used oil located behind the facility. The inspector observed five 55-gallon drums with open bungs and the contents had spilled/leaked onto the ground. The violations cited included used oil not managed properly and disposed into the environment; failure to ensure containers/above-ground tanks are labeled or marked clearly as "Used Oil"; failure to ensure used oil containers which are exposed to rainfall are closed; and failure to cleanup leaks or spills of used oil.

The department issued a notice of violation for these violations on Oct. 3, 2013. On Nov. 8, 2013, Harmon Transport had returned to compliance, having adequately addressed these violations.

The company signed an administrative order on consent and paid a one-time civil penalty and agreed to refrain from violations for all future inspections. The penalty amount was \$2,000 (\$1,000 to be paid up-front with an additional \$1,000 suspended on condition of no further violations for two years). The penalty was paid to the Texas County School Fund.

Pesticide Collection Activities

On Oct. 8, 2015, the Pesticide Collection Services Contract (B3Z15161) was awarded to Heritage Environmental Services, with the contract term running from Oct. 1, 2015, through Sept. 30, 2016.

On Dec. 9, 2015, the Pesticide Collection Program staff participated in the Green Industry Conference's Commercial Pesticide Applicator Training Track by providing a PowerPoint presentation on pesticide waste and disposal.

Pesticide Collection Program staff planned six pesticide collection events for 2016. These are:

- March 12 -- Portageville
- March 26 -- Poplar Bluff
- April 9 -- near Fairfax
- May 21 -- Canton
- June 4 -- Montgomery City
- June 25 -- Bolivar

New for 2016 the Pesticide Collection Program will be collecting empty triple-rinsed, plastic pesticide containers (up to 30 gallon in size) along-side the pesticide collections. Container Services Network will be providing the container collection service.

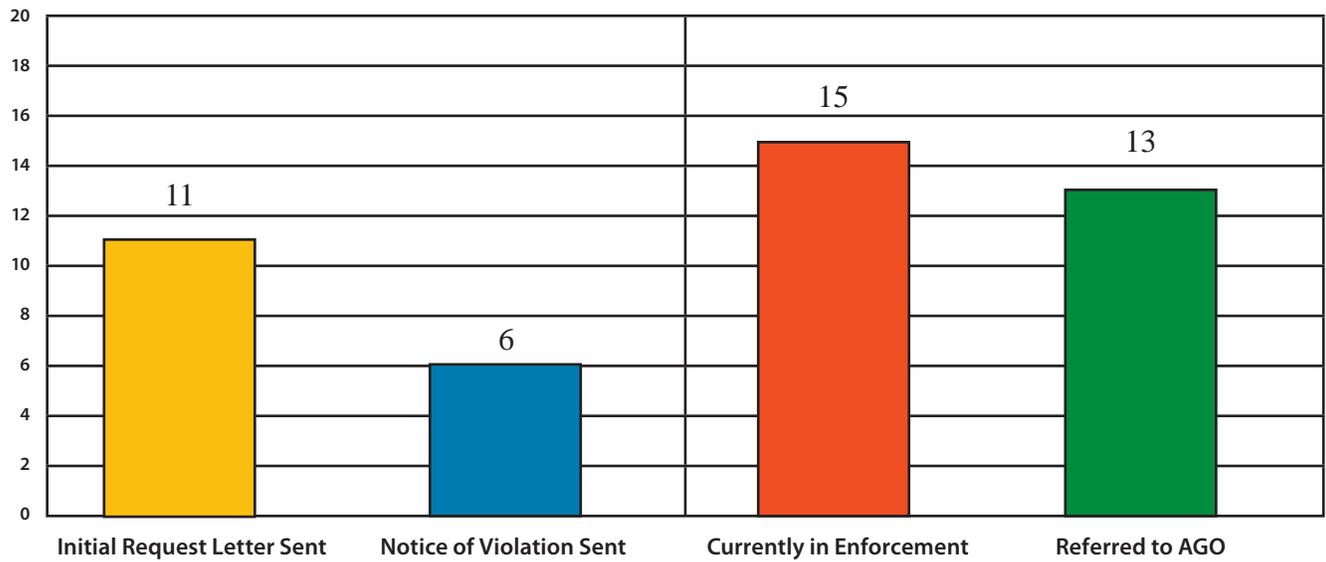
Pesticide Collection Program staff also prepared a training segment for commercial pesticide applicators to be given at several locations throughout the state in January 2016. A PowerPoint was developed to cover topics such as pesticide waste disposal, container cleaning and disposal and spill reporting.

Pesticide collection program staff drafted a fact sheet and a decision tree on pesticide disposal for businesses. The fact sheet will help businesses determine if the pesticide may be hazardous waste when the decision is made to discard the product and it will outline disposal options. Staff also drafted a trifold brochure to promote the pesticide collection program to distribute during outreach events.

Underground Storage Tank Facilities with Unknown Financial Responsibility Status Report

Financial Responsibility Status	Number of Facilities
Initial Request Letter Sent	11
Notice of Violation Sent	6
Currently in Enforcement	15
Referred to Attorney General's Office	13
Total Number of Facilities with Unknown Financial Responsibility	45

Number of Facilities in Each Financial Responsibility Step



*This semi-monthly report is derived directly from a copy of the UST Database and provides a “snapshot” of the status for each active underground storage tank facility not covered by a proper Financial Responsibility Mechanism.

Annual Underground Storage Tank Sources and Causes Report

In November, the Tanks Section completed the annual Sources and Causes of Releases Report for the period of Oct. 1, 2014, through Sept. 30, 2015. The department has placed this report online at <http://dnr.mo.gov/env/hwp/tanks/epasourceandcause.htm>. This report will also be made available by request to those without Internet access.

Subsection (c) of Section 1526 of the Energy Policy Act amended Section 9002 in Subtitle I of the Solid Waste Disposal Act to add requirements for states to maintain, update and make available to the public a record of USTs regulated under Subtitle I. EPA requires each state receiving funding under Subtitle I to meet the public record requirements. Subsection (d) of Section 9002 in Subtitle I requires EPA to prescribe the manner and form of the public record and says the public record of a state must include three elements:

1. The number, sources and causes of UST releases in the state
2. The record of compliance by USTs in the state with Subtitle I or a state program approved under Section 9004 of Subtitle I
3. Data on the number of UST equipment failures in the state

The first section of the report describes the number of UST facilities, individual regulated tanks, compliance rates in Missouri and an individual breakdown of the sources and causes of releases opened in federal fiscal year 2015. A total of 90 releases were opened at USTs in federal fiscal year 2015.

- Three instances of physical or mechanical damage to piping
- One instance of physical or mechanical damage to a submersible turbine pump area
- One physical mechanical damage releases to a dispenser
- One spill related to a delivery problem
- Three corrosion related releases
- Two installation problems
- Two other piping related issues
- Seventy-seven historical releases (unknown source). The unknown releases where a definitive source or cause of release was not able to be determined were discovered during:
 - Tank closure
 - Phase II investigations during property transactions
 - Other investigations

The website also includes reports on the sources and causes of UST leaks for previous years. The first report was completed in December of 2008.

Tanks Accomplishments for 2015

Tanks staff continued an expedited review process ensuring remediation reviews of high priority sites are completed in a timely manner. They continued an initiative on closing tank remediation sites that have been open for more than 20 years with the goal of providing additional information to the consultant to help completion of these projects and achieve No Further Action status for these sites.

The section began Tanks Backlog Project II, which involves follow-up on 27 old remedial claims. If these sites do not maintain insurance on operational tanks, they will lose benefits for remediation on on-going cleanup projects. Three of these sites have been closed, and 23 remain moving forward. One site has an inability to pay and is not moving forward.

Tanks staff continued to reduce turn-around times on document reviews by using funding to provide overtime. The section also hired one private contractor to provide state oversight of work on tanks sites. With these additional funds, staff estimate they can increase the number of cleanups using the 2006 MRBCA Guidance and decrease turnaround times.

The program's Budget and Planning Section continued to identify sites without the required financial responsibility instruments in effect, allowing the Compliance and Enforcement Section to follow up and assure sites without FR obtain coverage and to pursue penalties for sites not maintaining FR. These actions helped maintain a compliance rate of more than 98 percent.

The Budget and Planning Section continued to update tanks geographic information system data to conform with department standards and work to add tank facilities and cleanup sites to the Hazardous Waste Program's Long Term Stewardship mapper. The section also generated, processed and mailed fee cycle invoices for 2015 – 2019. Extra effort was made to reach the facilities/owners. Out of 908 invoices, only 64 facilities still have a balance due, resulting in a success rate of revenue collection of 93 percent.

The Compliance and Enforcement inspection team conducted 138 new installation inspections. The inspection team also continues to maintain their training, often direct from the manufacturers, on proper installation of tanks, piping and other equipment.

During calendar year 2015, the department accomplished the following work related to petroleum storage tanks:

- Properly closed 292 tanks
- Reviewed 126 closure reports
- Approved 125 closure notices
- Conducted 13 closure inspections
- Conducted four site investigations
- Responded to 20 emergencies involving petroleum releases
- Oversaw completion of 131 remediation sites
- Issued 891 certificates of registration
- Received 1852 remediation documents and generated 1744 response letters
- Notified of 82 new installations at tank sites and received 48 new site registrations
- Resolved 72 cases involving violations
- Conducted and/or reviewed 1090 inspections (including new installations, re-inspections, site visits, complaint and other investigations, as well as standard compliance inspections)
- Sent more than 1300 letters (including letters of warning and notices of violations) on UST inspections
- At the end of the 2015 calendar year, there were 125 active enforcement cases
- Financial responsibility compliance was at 98.5 percent reflecting insurance coverage from both PSTIF and other private policies and statements
- Currently regulating 3438 facilities with 8934 active underground storage tanks

Drinking Water Accomplishments

- In Portageville, the Tanks Section completed the investigation of drinking water contamination.
- In Buffalo, the Tanks Section completed the private drinking water well replacement and well replacement.
- In Wasola, the department completed the replacement of a drinking water well serving the Y-Store.
- In Potosi, the Tanks Section is currently determining the source of the drinking water contamination. Public water has recently been made available to the residents, so no further use of filters on drinking water wells is necessary.
- In Marston, began an investigation into the drinking water impact in a city drinking water well.

The Tanks Section finalized, routed for review, signature, copied and mailed 2,200 documents. It helped section, program and department staff when necessary, and continued to review and modify existing procedures to ensure accuracy and efficiency.

The Compliance and Enforcement inspection review team answers many equipment and operational site questions via telephone and e-mail. The team also regularly provides technical assistance, public outreach, regulatory interpretations and equipment explanation to other department staff, other agencies, the regulated community, contractors, manufacturers and the general public.

Missouri Department of Natural Resources - Hazardous Waste Program

**Petroleum Storage
Tanks Regulation
December 2015**

Staff Productivity	Jul-15	Aug-15	Sep-15	Oct-15	Nov-15	Dec-15	Jan-16	Feb-16	Mar-16	Apr-16	May-16	Jun-16	TOTAL
Documents received for review	197	213	220	205	163	178	0	0	0	0	0	0	1,176
Remediation documents processed	153	146	151	156	93	208	0	0	0	0	0	0	907
Closure reports processed	16	7	15	17	11	12	0	0	0	0	0	0	78
Closure notices approved	12	13	14	12	7	7	0	0	0	0	0	0	65
Tank installation notices received	6	6	10	5	1	10	0	0	0	0	0	0	38
New site registrations	4	3	7	3	8	5	0	0	0	0	0	0	30
Facility Data	Jul-15	Aug-15	Sep-15	Oct-15	Nov-15	Dec-15	Jan-16	Feb-16	Mar-16	Apr-16	May-16	Jun-16	TOTAL
Total in use, out of use and closed USTs	40,929	40,950	40,963	40,971	41,003	41,022	0	0	0	0	0	0	
Total permanently closed USTs	31,970	31,979	32,014	32,040	32,061	32,084	0	0	0	0	0	0	
In use and out of use USTs	8,955	8,967	8,945	8,927	8,938	8,934	0	0	0	0	0	0	
Out of use USTs	664	668	681	685	681	680	0	0	0	0	0	0	
Total hazardous substance USTs	403	403	405	405	405	405	0	0	0	0	0	0	
Facilities with in use and out of use USTs	3,441	3,444	3,441	3,438	3,440	3,438	0	0	0	0	0	0	
Facilities with one or more tank in use	3,209	3,210	3,203	3,199	3,203	3,201	0	0	0	0	0	0	

Closures

Underground Storage Tanks	Jul-15	Aug-15	Sep-15	Oct-15	Nov-15	Dec-15	Jan-16	Feb-16	Mar-16	Apr-16	May-16	Jun-16	TOTAL	All Yrs
Closure Reports Reviewed	16	7	15	17	11	12	0	0	0	0	0	0	78	
Closure Notices Approved	12	13	14	12	7	7	0	0	0	0	0	0	65	
Number of Tanks Closed (Closure NFA)	32	23	38	22	20	21	0	0	0	0	0	0	156	

Cleanup

Underground Storage Tanks													TOTAL	All Yrs
UST release files opened this month	4	9	10	6	6	8	0	0	0	0	0	0	43	6,687
UST cleanups completed this month	9	6	13	7	6	14	0	0	0	0	0	0	55	5,846
Ongoing UST cleanups	831	833	833	833	833	827	0	0	0	0	0	0		
Aboveground Storage Tanks														
AST release files opened this month	0	0	0	1	2	4	0	0	0	0	0	0	7	481
AST cleanups completed this month	2	0	1	1	0	0	0	0	0	0	0	0	4	302
Ongoing AST cleanups	175	175	174	174	176	179	0	0	0	0	0	0		
Both UST and AST														
Total release files-both UST & AST	0	0	0	0	0	0	0	0	0	0	0	0	0	80
Cleanups completed-both UST & AST	0	0	0	0	0	0	0	0	0	0	0	0	0	52
Ongoing cleanups-both UST & AST	27	27	27	27	27	28	0	0	0	0	0	0		
Unknown Source														
Total release files-unknown source	2	0	0	2	0	0	0	0	0	0	0	0	4	230
Cleanups completed-unknown source	1	0	0	1	1	0	0	0	0	0	0	0	3	213
Ongoing cleanups-unknown source	18	18	17	18	17	17	0	0	0	0	0	0		
Documents Processed	153	146	151	156	93	208	0	0	0	0	0	0	907	
*Reopened Remediation Cases	0	0	0	1	0	0	0	0	0	0	0	0	1	81

** Reopened Remediation Cases was added Nov. 18, 2009 - the cumulative total has been queried and a running total will be tracked/reported with the FY 2010 Tanks Section Monthly Reports.*

Effective December 2008 tanks with unknown substance will be included in total figures. Some measures are re-calculated each month for all previous months to reflect items added or edited after the end of the previous reporting period.

Missouri Hazardous Waste Management Commission Meeting

**April 21, 2016
Agenda Item # 11**

Legal Update

Issue:

Routine update to the Commission on legal issues, appeals, etc.

Information:

Information Only.

Presented by:

Ms. Brook McCarrick, Office of the Attorney General

Missouri Hazardous Waste Management Commission Meeting

**April 21, 2016
Agenda Item # 12**

Public Inquiries or Issues

Issue:

Opportunity for participants to speak to the Commission on relevant issues or matters before them.

Information:

Information Only.

Presented by:

Mr. Steve Sturgess – Director, HWP

Missouri Hazardous Waste Management Commission Meeting

**April 21, 2016
Agenda Item # 13**

Other Business

Issue:

Update to the Commission on Program matters and other relevant issues.

Information:

Information Only.

Presented by:

Mr. Steve Sturgess – Director, HWP

Missouri Hazardous Waste Management Commission Meeting

**April 21, 2016
Agenda Item # 14**

Future Meetings

Information:

Meeting Dates:

Date	Time	Location
Thursday, June 16, 2016	9:45 A.M.	Bennett Spring / Roaring River Room 1730 East Elm Jefferson City, Missouri 65101
Thursday, August 18, 2016	9:45 A.M.	Bennett Spring / Roaring River Room 1730 East Elm Jefferson City, Missouri 65101
Thursday, October 20, 2016	9:45 A.M.	Bennett Spring / Roaring River Room 1730 East Elm Jefferson City, Missouri 65101
Thursday, December 15, 2016	9:45 A.M.	Bennett Spring / Roaring River Room 1730 East Elm Jefferson City, Missouri 65101
Thursday, February 16, 2017	9:45 A.M.	Bennett Spring / Roaring River Room 1730 East Elm Jefferson City, Missouri 65101
Thursday, April 20, 2017	9:45 A.M.	Bennett Spring / Roaring River Room 1730 East Elm Jefferson City, Missouri 65101

Recommended Action:

Information Only.