

GENERAL SESSION
HAZARDOUS WASTE MANAGEMENT COMMISSION
October 15, 2015; 10:00 A.M.
1730 E. Elm Street
Roaring River Conference Room
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 videoed and will be available on the Commission's web page.

COMMISSIONERS PRESENT IN PERSON

Vice-Chairman Elizabeth Aull
Commissioner Mark Jordan

The phone line was opened at approximately 9:38 a.m. for Commissioners calling in to today's meeting.

COMMISSIONERS PRESENT BY PHONE

Chairman Charles (Eddie) Adams
Commissioner James (Jamie) Frakes
Commissioner Andrew Bracker

A roll call was taken with Chairman Adams, Vice-Chairman Aull, Commissioner Bracker, Commissioner Frakes and Commissioner Jordan acknowledging their participation in today's meeting.

1. PLEDGE OF ALLEGIANCE

Vice-Chairman Aull led the Pledge of Allegiance, and it was recited by the Hazardous Waste Management Commission (Commission) and guests.

2. APPROVAL OF MINUTES

- General Session minutes from the August 20, 2015, meeting:
Commissioner Bracker made the motion to approve, seconded by Commissioner Frakes.
A vote was taken; all were in favor, none opposed. Motion carried. Minutes approved.

Note: Vice Chair Aull left the minutes for signature of Chairman Adams at the next meeting, as he was participating in the meeting but was not present in person.

3. ADOPTION OF ORDERS OF RULEMAKING – “HAZARDOUS WASTE FEES AND TAXES”

Mr. Tim Eiken, HWP, addressed the Commission and noted that there was one action item on the agenda, the Adoption of one Order of Rulemaking. He noted that the Order of Rulemaking was for a proposed amendment of 10 CSR 25-12.010, which was published on July 15, 2015. He advised that the Public Hearing was held on August 20, 2015, and that the Amendment involved changes to hazardous waste fee structure.

Mr. Eiken provided an overview of the Hazardous waste generator registration and renewal fee – which increased from \$100 for all generators to \$150 for conditionally-exempt and small quantity generators and \$500 for large quantity generators. He noted that it would also include an exclusion that would allow multiple sites in close proximity operated by a single entity to pay a single large quantity generator registration and renewal fee. He also advised that the In-state fee for hazardous waste generated in Missouri – increased from \$5 per ton to \$6.10 per ton; and that the minimum amount for the in-state fee increased from \$150 to \$200 and that the minimum was to be applied to the first ton of waste.

Mr. Eiken went on to advise that at the August meeting a public hearing was held on the proposed rule and the only testimony other than the Department's was from REGFORM, in support of the proposed amendment and restructure. He also advised that through the end of the public comment period the Department had received no additional comments, although the one change was made subsequent to the publishing of the proposed amendment, as one section of the rule needed some clarification. He stated that the actual text of this was provided to the Commissioners in their packets and noted that it was located at the very end of the Order of Rulemaking. He advised that the one change proposed was to Section 10 CSR 25-12.010(2)(E)1., where it was determined that language was needed regarding collection of new generator registration and renewal fees for calendar years after 2017. He stated that the words “and beyond” were added following “calendar year 2017” to specifically state the new rate is in effect for calendar year 2017 and beyond. He noted that with that change the Department's recommendation was for the Commission to adopt this one order rulemaking with that change and clarification that was recommended.

Mr. Eiken advised that the rulemaking schedule was currently: on October 15, 2015 - Final adoption of rules by HWMC; on October 16, 2015 - Orders of Rulemaking to be filed with the Joint Committee on Administrative Rules; on November 16, 2015 - Orders of Rulemaking to be filed with the Secretary of State; on December 1, 2015 - Orders of Rulemaking to be published in the Missouri Register; on January 4, 2016 - Revised rules to be published in the Code of State Regulations and on January 1, 2017 - Rulemaking would become effective. He noted that this schedule did include a sixty-day period of review by the General Assembly and, if they did not disapprove, the new rate would go into effect the following January 1st of 2017.

Mr. Eiken advised the Commission that it was the Department's recommendation for them to adopt the Order of Rulemaking. Mr. Eiken inquired if the Commissioners had any questions.

Commissioner Frakes asked for a clarification as to whether the Department was asking for adoption of a modification of the proposed rulemaking or for adoption of the proposal, as the Department had made a modification of their original proposal. Mr. Eiken advised him that the proposed modification had been made prior to publishing so the modification was included in the proposed rule language; therefore, the Department was requesting adoption of the proposed language, not a modification. The modification option would have only included changes that the Commission or stakeholders had requested, following publication.

Chairman Adams made the following motion: *“I move that the Commission adopt the Order of Rulemaking for the proposed amendment of 10 CSR 25-12.010 published in the July 15, 2015, Missouri Register and that the Department proceed to file the Order with the Joint Committee on Administrative Rules and the Secretary of State.”*

Commissioner Frakes seconded the motion and the floor was open for discussion. Following no discussion on the issue a Roll Call vote was taken. Chairman Adams voted “Yes,” Vice-Chairman Aull voted “Yes,” Commissioner Frakes voted “Yes,” Commissioner Foresman was not present to vote, Commissioner Bracker voted “Yes,” and Commissioner Jordan voted “No.” The motion carried with an affirmative vote by four of the six Commissioners and the Adoption of the Order of Rulemaking was approved.

4. RULEMAKING UPDATE

Mr. Tim Eiken, HWP Director’s Office, addressed the Commission and noted that with the Commission’s adoption of the order on the fee rule, this completed the decision items on the two rules that the Department has been working through at the last couple meetings. He noted that with the Commission’s previous action on the “No Stricter Than” rulemaking, the final Orders of Rulemaking were filed with the Secretary of State. He noted that when we file rulemakings, we usually receive questions; and, sometimes modifications of what we file, based on their review and their own statutory requirements. He advised that we ended up having to make one change to one of the orders of rulemaking that we filed. He noted that it was the one related to used oil, where we had proposed to change the requirement related to the Missouri used oil shipment record to make its use optional. But, he advised, when we filed that final Order of Rulemaking with the Secretary of State, it was determined that we had not included any changes to that specific section of the rule when we proposed the amendment, and that we may change only those sections of the rule that are actually printed in the proposed amendment. He advised that this section had no changes that were not printed in the text of the proposed amendment; so, with that limitation, we could not make that change in the Order of Rulemaking. To respond to this, we added a comment that we will make this change in a future rulemaking. He then stated that the final review of those orders of rulemaking had been completed and that they should be published in the Register in the next couple of weeks.

Mr. Eiken then went on to discuss the rulemaking related to underground storage tanks. He advised that he wished to provide the Commission with some current information, and noted that draft language would be presented to the Petroleum Storage Tank Insurance Fund (PSTIF) Advisory Committee as there’s a statutory requirement in the rules that before they

are proposed they had to be presented to that committee for review and input. He stated that the presentation would be taking place the following week.

Mr. Eiken then advised the Commission that before publishing the proposed rules, the Department would be hosting a series of outreach meetings around the state. He noted that these meetings would be providing information on what's changing and soliciting feedback from the tank community. He also noted that it would be happening in the next couple months. Mr. Eiken also advised that there was a web site dedicated specifically to this rulemaking, where all current information related to these proposed rules will be posted as we go forward.

Mr. Eiken then inquired as to whether the Commission had any questions on the rulemaking he had discussed, to which there were none.

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

5. NEW PROPOSED EPA RULES

Mr. Tim Eiken, Director's Office, addressed the Commission to discuss two new rules proposed by the U.S. Environmental Protection Agency. Beginning with the proposed Generator Rule, Mr. Eiken advised that this agenda item relates to two recently proposed federal rules that have been published in the Federal Register and are currently open for public comment. He noted that he would be providing the Commission with information on the first rule related to hazardous waste generators and Kathy Flippin would be providing information on the second rule, related to pharmaceutical waste. He noted that these are common in subject matter and that these rules will make some fairly significant changes. He went on to advise that there have been some longstanding arguments regarding both of these so the Program wanted to provide some general information, as the draft rule text was out for public comment, and will ultimately affect Missouri's regulations once they were adopted and finalized.

Mr. Eiken advised that the first rule relates to hazardous waste generators, which basically covers a lot of the same territory that was just covered with "No Stricter Than" rulemaking. He noted that it involved generators, storage and accumulation, labeling of containers, etc.; a lot of the same subject matter. But, he stated, beyond that, EPA is proposing to reorganize the regulations in the Code of Federal Regulations, moving things around so that they are easier to find, which makes more sense for generator related rules to be in one place. He noted that currently it's very difficult sometimes to determine what you're supposed to do because we have to bounce from regulation to regulation; so, the idea behind the reorganization is to get all requirements in one place for large quantity and small quantity generators that will help clarify the requirements. He advised that the EPA is also looking to provide some flexibility to generators who manage waste; similar to some of the things that were included in our "No Stricter Than" package. He stated that over the years there were certain situations where the regulations don't seem to fit reality; so, giving generators some additional options in terms of

how they manage their waste and then addressing the regulations is what they are proposing to do with these changes.

Mr. Eiken provided a PowerPoint and noted that reorganizing the regulations was designed to make them more user-friendly and thus enable improved compliance by the regulated community. He advised they would also provide greater flexibility for hazardous waste generators to manage waste in a cost-effective manner, strengthen environmental protection by addressing identified gaps in the regulations and clarify certain components of the hazardous waste generator program to address ambiguities and foster improved compliance. He advised that some companies would like to be able to consolidate wastes from multiple conditionally exempt small quantity generators (CESQG) sites for more efficient shipping and hazardous waste management. He noted that this could also reduce liability for a company as a whole to ensure proper management of hazardous waste, and that sending the waste to a RCRA-designated facility is the most environmentally sound option. He went on to state that currently a large quantity generator (LQG) needs a RCRA permit to receive CESQG wastes.

Mr. Eiken directed the Commission's attention to one of the slides which showed the Commission and participants where things currently are in the federal regulations and where they will be. He noted that the proposed amendment would have a major impact for Missouri as when the EPA moves the rules we will have to go back and make sure all our state regulations are correct and are in the correct place. He advised that it would take some work on our part to make sure that all those are updated and correct.

Mr. Eiken noted that there is also a proposal for a LQG to consolidate waste if it is under the control of the same person. He noted the "Person" under RCRA is the one who has power to direct hazardous waste policies at the facility. Other requirements included: for CESQG, they must mark and label waste containers with "VSQG Hazardous Waste;" for LQGs, they must notify the state with a notification of regulated waste form that they are participating in this activity and identify what CESQGs are participating. He advised that there were recordkeeping requirements for each shipment, that LQG consolidated waste must be managed as a hazardous waste and that they would need to report this activity in their Biennial Report.

Mr. Eiken also noted that there would be revised requirements for episodic generation which acknowledges that current RCRA rules lack flexibility to address an "episodic" change in a generator's regulatory category: examples of situations where flexibility is needed include both planned events, periodic maintenance, tank cleanouts, etc., and unplanned events, spills, acts of nature, shutdown in production lines, etc. When any of these situations occur, a generator often must change their generator status to account for the additional amount of waste being generated from the planned or unplanned event and as a result generators must comply with a more comprehensive set of regulations for that short period of time. He advised that the proposed rule would allow generators to maintain their existing category provided they comply with streamlined set of requirements, if it is limited to once a calendar year with ability to petition for second event; they must notify the EPA or state prior to initiating a planned episodic event; and, they have up to 45 days to complete the "episodic"

event(s) and ship waste off-site; with a 30 day extension possible. He also noted that we keep track of this information to make sure the generator is in compliance with the regulations.

Mr. Eiken advised that this proposed rule would also address emergency preparedness and planning and streamlined requirements for the preparation of contingency plans and for documenting the required arrangements with local emergency responders. For contingency plans, the proposed rule streamlines the requirements for the content of these plans, covering such topics as what to do in the event of a release. He noted that with regards to releases, we dealt with these in our regulations as this is where generators are required to coordinate with their local emergency responders so that those responders know what types of waste they have where, in the event of a situation. It will require that they have that information available, and although it is required, sometimes it doesn't happen. The idea behind the changes are to try to make generators comply with the regulations by making it more and more clear what it is exactly that they're supposed to do.

Another issue addressed in the proposed rule is hazardous waste determinations. He advised that this is a very common compliance problem as generators consistently fail to make a correct hazardous waste determination, leading to the mismanagement of hazardous waste. He noted that non-compliance rates range from 10 to 30 percent and that reasons vary from not understanding RCRA to not even being aware of RCRA. He stated that current regulations clearly require maintaining documentation of determinations that a waste is hazardous, but not the alternative when a generator has determined that their waste is not hazardous. He noted that the rule would now require SQGs and LQGs to keep documentation when a solid waste is determined to not be a hazardous waste. He noted that the proposed requirements would also confirm that a generator's waste must be classified at its point of generation and at any time during the course of management for wastes potentially exhibiting a hazardous characteristic, would explain more fully how generators can use generator knowledge, and explain more completely in the regulations in 40 CFR 262.11 how a generator should evaluate its waste for hazardous characteristics.

Mr. Eiken also noted that the new rule attempts to provide a solution to the labeling requirements for hazardous waste containers. Under the requirements in the proposed rule, container labels must indicate the hazards of the contents of the containers; container labels must have "plain English" words that identify container contents; there would be flexibility in how to comply with this new provision; and generators can indicate the hazards of the contents of the container using any of several established methods. Tanks, drip pads, containment buildings can keep this information in logs or records kept near the accumulation area. He noted that the words "hazardous waste" on a container doesn't tell you a whole lot about the hazards associated with what is contained; what's actually in that container. He noted that one of the reasons for using the chemical name is that words, like "used solvent," do not accurately describe the hazards of what is inside the container. In order to comply with the proposed requirements for labeling containers, generators could choose one of several methods, including DOT labels or symbols established by the Global Harmonization System. Because the rule does not prescribe one specific method, each generator can use the label that best describes the container's content.

Mr. Eiken advised that the next area addressed was Generator Re-notification and Reporting. He stated that the problem was that the EPA and most states have outdated and inaccurate databases of SQG universe information because there is no requirement to re-notify periodically after the initial notification; and that the lack of updated data makes it difficult to make programmatic decisions, or to plan or execute inspections effectively. Mr. Eiken explained the proposed solution was to require SQGs to re-notify every two years, along with the electronic reporting option. He advised that generator re-notification and reporting is an item that we already require in Missouri; where, if any of your generator information changes, you submit your generator notification to tell us what has changed. He advised that if adopted as proposed, this will be part of the federal regulations now as well, in that, every two years you have to re-notify with the current information.

Mr. Eiken stated that satellite accumulation was also addressed in these changes. He noted that again, this same topic was addressed with our own rules. He did note that mostly what they're changing here is not so much the accumulation time, as we did, or different methods of compliance, as we did; but, they were adding or changing other requirements. The proposed changes require that hazardous wastes not be mixed or placed in a container with other hazardous wastes that are incompatible; it allows containers to remain open under limited circumstances, when necessary for safe operations; and it provides for a maximum weight in addition to volume for acute hazardous wastes. It clarifies that "three days" means three calendar days; explains that when maximum weight or volume is exceeded, waste must be moved to a central accumulation area or TSD; and, rescinds the memo allowing reactive hazardous waste to be stored away from the point of generation.

Mr. Eiken noted that the final issue he would be covering pertained to the fifty foot requirement for storage of ignitable or reactive waste. He noted that with current regulations, ignitable and reactive waste has to be stored at least fifty feet away from the property line; whereas with the Missouri rule, we allowed storage closer than 50 feet if you meet a series of conditions that are spelled out in our rules. So, Missouri rules provide for some flexibility, and with these changes, the EPA would allow for storage closer than 50 feet if you obtain a waiver from the local fire department. He noted that this is very similar to what we have used in certain situations, as we recognize that some generators, because of space limitations, cannot get containers more than 50 feet away from the property line.

Mr. Eiken advised that in summary, the items in the proposed rule that will be more stringent are: documenting hazardous waste determinations; SQG re-notification; identifying risks of wastes being accumulated & labelling; notification of closure; biennial reporting for the whole year; and an executive summary for contingency plans. He also advised that those items that will be less stringent included CESQG consolidation; episodic generation; and the waiver from the 50-foot rule.

Mr. Eiken also noted that these changes were tightening down the regulations and sometimes that makes a difference in terms of state adoption to things that are more stringent. He stated that we don't always have the option of adopting things that are less stringent as they do vary with the "No Stricter Than" statute that affects our ability in terms of what we can adopt and can't adopt; so that's another issue for us to consider. He stated that the proposed rule was

signed a couple of months ago and it's currently out for public comment so the HWP has staff looking at this rule and will probably be providing some comments. He noted that staff will need to prepare any Department comments on this proposal within the comment period, so staff is keeping a close eye on this one as it'll make some significant changes to some longstanding rules. He noted that this ended his piece regarding the generator rule and inquired if the Commission had any questions. No questions were posed.

Ms. Kathy Flippin, Chief, Compliance and Enforcement Section, addressed the Commission and noted that she would be presenting information on the second proposed Federal rule, which involves management standards for hazardous waste (HW) pharmaceuticals. Ms. Flippin began by describing the flow of pharmaceuticals and defining what was a "creditable" pharmaceutical and what was a "non-creditable" pharmaceutical, along with reverse distributors. She advised that most unused pharmaceuticals were potentially creditable, whereas items such as floor waste and certain pharmacy drugs were non-creditable. She noted that healthcare facilities and pharmacies can return unused pharmaceuticals to reverse distributors who send the drugs on to other distributors or return to the manufacturer. Drugs that cannot be returned would be disposed at TSDs. She stated EPA's concern that a large portion of "non-creditable" pharmaceuticals are disposed of improperly, including being flushed into sewer systems. Ms. Flippin explained EPA's intentions to address the following problems in the rule: the regulatory status of creditable pharmaceuticals, the manufacturing-oriented framework of the generator regulations, the LQG status due to P-listed waste, the intersection of EPA & DEA regulations, containers with P-listed pharmaceutical residues, and pharmaceuticals being flushed/sewered.

Ms. Flippin explained that the proposed pharmaceutical rule changes included a new subpart P in 40 CFR Part 266, which provided for a tailored, sector-specific regulatory framework for managing HW pharmaceuticals at healthcare facilities and pharmaceutical reverse distributors (PRDs), and required that SQGs and LQGs manage HW pharmaceuticals under subpart P rather than as hazardous waste – and was not optional. She explained the differences between tailored standards for non-creditable pharmaceuticals (i.e., those not expected to be eligible to receive manufacturer's credit), and creditable (those that can be sent to reverse distributors). Ms. Flippin noted that this would apply to healthcare facilities, pharmacies, veterinary clinics, physicians' and dentists' offices, chiropractors, outpatient care centers, hospitals, nursing care facilities, medical examiners and coroners' offices. It would also apply to pharmaceutical reverse distributors, and owners or operators of treatment, storage, and disposal facilities that manage HW pharmaceuticals.

Ms. Flippin provided an overview of the proposed rule, defining some key terms, including standards for healthcare facilities. She noted that this included non-creditable pharmaceuticals and those transported as hazardous waste, and using a manifest to send to an approved TSD. It also included creditable pharmaceuticals that healthcare facilities may send to PRDs for processing manufacturers' credit, and covered the standards for safe/secure delivery, along with the accumulation standards for PRDs.

She advised that these changes provided for a new regulatory category – Pharmaceutical reverse distributors (PRDs). She noted that PRDs were not regulated as generators or TSDs,

but standards are proposed similar to those for LQGs. The changes also provided a prohibition on disposal down a toilet or drain (i.e., flushing or sewerage) and that waste handled under these standards were not counted toward generator status. She also advised that it also covered a conditional exemption for HW pharmaceuticals that are also DEA controlled substances, along with standards for container residues.

Ms. Flippin then discussed the six issues that these changes covered, beginning with the 6th issue, sewerage pharmaceuticals, and advised that the proposed language bans sewerage of pharmaceuticals by all health care and PRDs, including CESQGs who not otherwise subject to Subpart P.

She advised that 5th issue on the list was containers with residues and these changes no longer require triple-rinsing of acute/P-listed containers or cleaning by other equivalent methods if fully dispensed, which would classify them as RCRA empty. She noted that residues in unit-dose containers and dispensing bottles/vials would be exempt from RCRA (if in quantities of less than 1,000 pills or bottles/vials up to 1 liter), and that the container may be disposed as non-hazardous waste after crushing. She also advised that dispensed syringes were exempt from RCRA standards if the syringe was used to administer the medication to a patient and the syringe is placed in a sharps container that is managed appropriately. She noted that the rule would require that facilities manage all other containers as hazardous waste, such as delivery devices that once held listed or characteristic hazardous waste, including: IV bags, tubing, inhalers, aerosols, nebulizers, tubes of ointment, gels or creams.

Ms. Flippin advised that the 4th issue involved the intersection of DEA & EPA rules and that the few RCRA hazardous wastes that are also DEA controlled substances will have conditional exemptions. She advised they would be exempt from RCRA if they were managed in accordance with all DEA regulations and were combusted at a permitted municipal solid waste or hazardous waste combustor. She noted that also, authorized collectors of DEA controlled substances that co-mingle them with pharmaceuticals that are exempt household hazardous waste would be exempt from RCRA regulation.

Ms. Flippin noted that the 3rd issue was in regards to the effects on the status of a LQG if they manage acute pharmaceutical hazardous waste and that HW pharmaceuticals do not have to be counted toward the healthcare facility's generator status when managed under subpart P.

The 2nd issue included the manufacturing framework, accumulation on-site at healthcare facilities, and shipments off-site from a healthcare facility. Ms. Flippin noted that manufacturing standards in the Part 262 generator regulations are replaced by sector-specific management standards for management of HW pharmaceuticals at healthcare facilities and PRDs. She said that this will not include SQG and LQG generator categories, satellite or central accumulation area regulations. On the accumulation topic, Ms. Flippin advised that there would be a requirement of a one-time notification as a healthcare facility, it would require performance-based training for healthcare workers and there would be no Biennial Report for HW pharmaceuticals. She also advised that for potentially creditable HW pharmaceuticals there would be no specific labeling or accumulation limits proposed. But, she noted, for non-creditable HW pharmaceuticals, the requirements would be similar to UW

standards, with 1 year accumulation, requirements for closed containers to be secured to prevent access to contents, requirements that wastes that can't be incinerated must be accumulated separately, and that although HW codes are not required on accumulation containers, they need to be labeled as "Hazardous Waste Pharmaceuticals." She went on to explain that with regards to shipment off-site from a health care facility, that potentially creditable HW pharmaceuticals would require written, advance notice of shipments to a PRD a shipment receipt confirmation by the PRD; recordkeeping of shipments to a PRD; that a common carrier was okay and that HW codes were not required during shipment. She explained that non-creditable HW pharmaceuticals must go to a TSD, and that it requires a licensed HW transporter, applicable manifesting; and that although HW codes are not required on manifests, "hazardous waste pharmaceuticals" must be in box 14 of manifest.

The 1st and final issue Ms. Flippin described was the status of creditable pharmaceuticals, and that one issue was the point of generation. She advised that under current guidance, the point of generation of creditable pharmaceuticals is at the PRD, with an assumption that some will be redistributed. She advised that some of these are not regulated as wastes even though discarded, after the manufacturing credit is processed by the PRD. She advised that EPA was attempting to address concerns about the lack of tracking and potential for theft, and that to remove certain uncertainties for the PRDs and the healthcare facilities that use them. She also noted that the EPA is finding that there was little to no redistribution of pharmaceuticals occurring during reverse distribution, so they are revising the rule to reflect the process of making a decision to send to a PRD, or a decision to discard. She noted that the point of generation for pharmaceuticals sent to a PRD is at the healthcare facility, not the PRD and that it was hoped that these changes would result in better tracking of shipments of creditable pharmaceuticals to PRDs, as there should be better oversight of PRDs through the notification requirements.

Ms. Flippin outlined the reverse distributor standards and noted that a PRD is a new type of HW management facility that can only accept "potentially creditable HW pharmaceuticals;" that there is no RCRA storage permit required; that all PRDs are regulated the same for HW pharmaceuticals (no generator thresholds); and that there are standards similar to LQGs with the following additions: there is a requirement for a one time notification as a PRD, one for an inventory of HW pharmaceuticals, and one for facility security. She noted that potentially creditable pharmaceuticals are HW pharmaceuticals that have the potential to receive manufacturer's credit, which includes pharmaceuticals that are unused or un-administered, unexpired or less than one year past the expiration date. She advised that the "potentially creditable" term does not include evaluated HW pharmaceuticals, residues of pharmaceuticals remaining in containers, contaminated personal protective equipment, and clean-up material from pharmaceutical spills. She defined "not potentially creditable" as pharmaceuticals that have no reasonable expectation of credit, and the pharmaceutical cannot go to a PRD if it is a sample, a generic, is more than 1 year past expiration, has been removed from original container and repackaged for dispensing, or was generated during patient care or was refused by a patient.

Ms. Flippin also advised that as long as a manufacturer's credit is being determined or verified and pharmaceuticals are destined for an RD they are still "Potentially Creditable HW

Pharmaceuticals.” She also advised that once a manufacturer’s credit has been determined or verified and pharmaceuticals are re-destined for a TSDF, they are “Evaluated Pharmaceuticals.” She outlined the flow of HW pharmaceuticals and noted the maximum number of transfers allowed, and that there was a limitation of 90-days maximum allowed at each PRD. She advised that the PRD was responsible for evaluating each potentially creditable HW pharmaceutical within 21 calendar days of arrival to determine whether it is destined for another PRD for further evaluation/verification of manufacturer’s credit, or destined for a permitted TSD. She explained that if a PRD receives HW other than potentially creditable HW pharmaceuticals, it must prepare an unauthorized waste report, ship it to the shipper and state and manage the waste appropriately. She also explained that there was a 90 day total accumulation time restriction on potentially creditable HW pharmaceuticals; that there are no specific labeling or container standards and that for evaluated HW pharmaceuticals there must be a designated on-site accumulation area and the facility must conduct and keep a log of weekly inspections. She noted that other requirements include LQG training for personnel handling evaluated HW pharmaceuticals, requirements for closed containers if holding liquids or gels and that wastes that can’t be incinerated must be accumulated separately (e.g., P012). The assignment of HW codes is required prior to transport off-site and there must be a label designating the shipment as “Hazardous Waste Pharmaceuticals,” and submission of a Biennial Report.

Ms. Flippin also outlined the standards for off-site shipments from a PRD and advised that for shipments off-site from an reverse distributor, potentially creditable HW pharmaceuticals can go to another Pharmaceutical Reverse Distributor; but, there must be written, advance notice of shipments to the next RD, confirmation of receipt of shipment by the next RD, and recordkeeping of shipments to the RD. She noted that a common carrier was allowed, that HW codes were not required during shipment; but that evaluated HW pharmaceuticals must go to a TSDF and that a licensed HW transporter was required, that manifesting was required and that HW codes were required on the manifest.

Ms. Flippin ended her presentation by advising that on the whole, this proposed rule is more stringent than current policy and regulation. She stated that States will be required to adopt the final rule, regulated parties will be required to use the final rule, and that the sewer ban is effective in all states upon the effective date of the rule, even before the state adopts it. She advised that the schedule for this rule was the publication in the Federal Register on September 25, 2015, with a 60-day public comment period; then the EPA reviews public comments and commences work on the final rule, and they will then decide whether to proceed on additional proposed or final rules related to expanding which pharmaceuticals are hazardous, and the issues regarding Nicotine.

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

6. PLANNED OUTREACH – “NO STRICTER THAN”

Ms. Kathy Flippin, Chief, Compliance and Enforcement Section, addressed the Commission noting that the Program had several planned outreach events with regards to the recent

passage of the “No Stricter Than” rule. She advised that several of the outreach efforts have already been undertaken and outlined events that were planned for the future. She noted that the legislation will have an impact on how we address Missouri generator facilities. She advised that a Regional Office workshop was held on October 16th and that a large part of that was discussing the new rules with our inspectors and EPA staff. She also noted that discussions were held on what the different factors were and what changes needed to be made on the inspection checklists. Ms. Flippin noted that program staff would be presenting at the REGFORM conference in November as well, in separate presentations that will cover several different topics. She advised that webinars were also planned for late November, about an hour and a half in length, with the first one being a walk-through of our proposed changes directly related to the “No Stricter Than” in Chapters 3, 4 and 5, and the second part addressing Chapter 7 and other federal rule incorporations and updates. She noted that the Program was also trying to get the word out on these changes in mailings, and that information would be included in the annual invoices to generators and treatment, storage and disposal facilities. She also advised that staff are developing a newsletter that will include the information on the changes, will be making it available on the web and also tell folks about it in our mail out. She stated that people who want a paper copy can do that too; but, that we definitely want to make everything available electronically and the web pages provide a link to where people can see copies of the new inspector checklist as well. She went on to report that during the workshop staff identified a couple of things where some additional guidance would be beneficial, and noted that the guidance should be in a very short format for people so they can better understand the rules. Staff is working on these items.

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

7. DEVELOPING POST CLOSURE GUIDANCE

Mr. Rich Nussbaum, Chief, Permits Section, HWP, greeted the Commissioners and advised them he wished to share some information on a post closure care guidance that the EPA had recently released. He noted that this was an issue that the Permits Section deals with routinely and that there were a number of facilities that fall in this category. He advised that the EPA, at the urging of states, has developed some guidance on the issue, in coordination with input from the states. He stated that he wanted to walk through the aspects of this as it affected the HWP so he would like to provide some background. He began by explaining that at a site that has a regulated unit that is permitted or under interim status, and it goes to close and waste is in still in place, “closes dirty,” or there is groundwater contamination related to that particular unit, then there are post closure care requirements that are triggered for that particular unit. He advised that in doing so the regulations indicate that a period of thirty years is required for post closure care. Mr. Nussbaum advised that he was not sure where the “Fed’s” ultimately came up with that thirty year timeframe to begin with, and whether that was an appropriate timeframe or not; but, it was developed for long-term management of units that close “dirty” and so ultimately the regulations allowed for that to be shorted or extended.

He stated that the problem is there really weren't any criteria to apply to figure out whether we should shorten or lengthen the post closure period. Mr. Nussbaum advised that an example of

this, which could apply to a lot of different types of facilities, is the BFI Missouri City landfill. He noted that it was an engineered hazardous waste landfill, where there were a multitude of disposal cells in the area that have been closed and were capped collectively. He stated that there is an ongoing groundwater monitoring and cap maintenance requirement and there was some leachate management going on as well. He noted that this condition could apply to these kinds of facilities where there's a large amount of stabilized waste in place, and described several scenarios that would require post closure care. He also advised that there are reporting aspects imposed for closure care and maintaining waste containment and remedial systems. He stated that at the BFI Missouri City facility there are acres and acres of cap that has to be maintained, that they've got a big facility and a lot of ongoing maintenance where there is a need for these requirements.

Mr. Nussbaum noted that these facilities are governed by the federal regulations that are incorporated by reference in the state regulations under 40 CFR 264 for permanent facilities and 265 for interim status facilities; and that there are also additional requirements that can be found in those sections. He stated that to the extent that anything above and beyond what's in the regulations is needed, there was the potential to include those requirements in the permits for those facilities. He went on to state that the problem we're running into is a lot of our sites now have gone through closure and they're getting to the end of that thirty-year period and that he thought the premise originally was that industry thought that at the end of thirty years, "we're done, we don't have a continuing obligation at that point to do anything more." He stated that unfortunately in the case of a lot of facilities where there's contamination in groundwater, contamination is not going away and so ultimately there needs to be some means to continue to monitor; and, if necessary, remediate, as in the case of facility like BFI Missouri City, where there's waste in place.

Mr. Nussbaum advised that it has always been the premise that any engineered structure over time is going to have its problems, and that problems have been discovered at that particular facility, along with others. He advised that some others have ongoing issues with releases from what was an engineered structure so we don't really get in to the factors of whether to shorten or lengthen the timeframe. He advised that flatly, these questions have risen and now we have the question of how do we address it now that we're getting to that point with many of our facilities.

Mr. Nussbaum advised that he had been a member of the corrective action permitting task force and that this is one of the issues that had been raised within the context of the group. He noted that after some preliminary discussions with EPA regarding developing guidance on this topic, the EPA had embraced the idea as they knew the regions were facing challenges. He went on to report that following preliminary discussions with EPA headquarters they had also engaged those that were involved in post closure care at subtitle D solid waste management facilities. He advised that should give some idea as to what the length and breadth that guidance might be looking like. He stated that ultimately, through those discussions, it was decided that subtitle C hazardous waste facilities were not fundamentally different but different enough from subtitle D facilities that EPA decided to separate the two. He advised that he was unsure as to what extent they're working on guidance for subtitle D; but, he thought this guidance, under separate subtitles, was going to be a springboard to

looking at post closure care guidance for solid waste landfills as well. So, he noted, this sort of evolved into a larger collaborative effort between EPA and the States.

Mr. Nussbaum noted that the objectives of the guidance was to assist regulators as they wanted to know what factors need to be considered in making the determinations whether to shorten or lengthen the post-closure care period; and also, to let facility owners and operators know what kind of documentation was going to be needed to make those decisions. He also advised that with that information out there it will hopefully provide greater transparency and consistency in that decision making process across the United States: so, again, focuses on subtitles C facilities and technical criteria in the draft guidance really assists the process for preparing to evaluate the post closure care period. He also advised that there is a summary of applicable requirements, but it really doesn't replace any existing guidance. He noted that it's out there, but it really doesn't get into the issue of financial assurance, which is very important in the post closure contracts because for as long as post closure care is required, those facilities have to provide financial assurance to make sure that those post closure care obligations are satisfied and that these sites don't turn into Superfund sites because they ran out of money.

Mr. Nussbaum stated that the first criteria to be looked at are the presence of hazardous wastes and any residual contamination. He noted that if you've got a closed hazardous waste landfill that has large quantities of waste in place, that's one thing; but, if you've got a closed container storage area where there is residual contamination that's really from a release, but there are not large amounts of source material there, that's certainly a consideration in the decision-making process. He also advised that the nature of the waste in the residual contamination is a factor; what is still there, is it going to naturally degrade or is it very persistent in the environment? He noted that those are questions we need to ask ourselves, and in looking at this issue, also what type of unit it is. He noted that at a landfill, is it the result of a former container storage area and was there a good operational history in terms of waste containment and monitoring; or are there persistent problems or other things?

He advised that other questions that will need to be addressed, if there's waste in place, are related to whether there is groundwater contamination, and if so, at what levels? Is it relatively stable in terms of its extent or are there ongoing releases that are causing further work to be done in order to assess and characterize, and perhaps even capture that groundwater. As an example, citing a geology hydrogeology plan in northern Missouri; although we don't really have any closed landfills and glacial settings, if you've got a tight clay then you've got a likelihood that you're not going to have a lot of mobility with that contamination. He advised that the example represented one possibility, versus being in the southern half of the state where you have karst and you've got the potential if something gets away from you, it could get into springs and creeks. He noted that those factors are another consideration that goes into determining whether to lengthen or shorten the period. He also noted that there is a facility history component, based on their performance history; considerations with whether they've had ongoing operational problems or not.

Mr. Nussbaum noted that if we were to terminate post closure care, questions to be answered include if there are other controls that might be in place or other options that could be used to

continue to manage the site's factors that should be considered in the recommendation. He noted that obviously it is logical to look at this issue before you hit that thirty-year period and see what the information is telling you about the need to lengthen or shorten the period. Other considerations include the ongoing monitoring results at these facilities, as he advised that we typically get and have long term monitoring, and we would want to take a look at that in addition to any inspection information regarding the cover and containment systems. Also considered would be information regarding land use controls and whether there are covenants or restricted use of property that might enter into that discussion.

He noted that this document has been out for public review and comment; and that the EPA had used a shotgun approach and got it out there to the actual regulated facilities and permit writers, the trade associations and environmental groups. He noted that the comment period ended July 31, 2015, and they did receive a multitude of comments across the board from these various groups. He noted that the EPA had planned to engage those of us who had been involved in developing this guidance in responding to those comments; but, we were later informed, similar to their rulemaking, that once they got the comments it was now EPA's responsibility since it was their guidance and they were actually obligated to respond. So, those of us who were closely involved in this have been cut out of the loop until the EPA makes its decisions. Ultimately, he noted, the EPA hoped have this guidance issued final by the end of the calendar year, although that deadline is quickly upon us and he advised he was unsure if they would meet that deadline. But, he advised, ultimately this will help us give us some guidance when making these decisions, regarding issues that aren't currently in the regulations themselves.

Commissioner Aull inquired as to how many facilities like this are across the state?

Mr. Nussbaum advised that he couldn't give an exact number but that we basically have a couple of dozen of these out there.

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

8. DRYCLEANING ENVIRONMENTAL RESPONSE TRUST (DERT) ANNUAL REPORT

Mr. Scott Huckstep, Chief, Brownfields/Voluntary Cleanup Section, HWP, addressed the Commission and advised that it's within that section where the dry cleaner fund resides. He noted that he was here to provide a report regarding the Drycleaning Environmental Response Trust (DERT) Fund Annual Report and, as required by law, the balances were distributed in a report for the previous calendar year to the governor and legislature. And, he advised, the four basic elements the report was to include were receipts to the DERT fund, disbursements, the extent of corrective action, and the prioritization of reimbursements for those sites. Mr. Huckstep provided a PowerPoint presentation for the Commission and meeting participants, which outlined the following information.

Mr. Huckstep outlined the two sources of revenue that come in to the fund, with the first being the dry cleaner registration surcharge which is paid by dry cleaners and is based on the

amount of chlorinated solvents that are used during the calendar year. He noted that the fees fall in to three categories, at a \$500, \$1,000 or \$1,500 surcharge. And, he noted, the other surcharge is paid by the suppliers of the chlorinated solvents and that's an \$8 per gallon surcharge. He went on to note that when the fund first started back in 2000, there was 375 dry cleaners that use chlorinated solvents that were required to register with the Department. And, he advised, as of September of this year, this number was down to 130 dry cleaners that meet that requirement. Mr. Huckstep directed the Commissions attention to the chart and showed that over the years there has been a continual decrease in dry cleaners that are required to register with us, as there has been a decrease in dry cleaners that use chlorinated solvents. He advised that as we see a decrease in the total gallons of chlorinated solvents that are purchased by the dry cleaners, there is a sharp decline in revenues in to the fund.

Mr. Huckstep went on to note that some facilities decided to switch over to non-chlorinated solvents thereby they're not required to register with us. He also advised that the shift really began in 2008 when the economy went bad, that it affected a lot of dry cleaners. He noted that many of them ended up going out of business. He also advised that with some dry cleaners, they may have had multiple locations and have consolidated their cleaning operations, so they would only have to pay the surcharge for that location. He also noted that with the newer generations of dry cleaning machines, the fourth and fifth generations of that type of equipment, they are much more efficient than they were ten or fifteen years ago so they use quite a bit less amount of solvents in their dry cleaning and with the decrease in dry cleaners solvent usage, there is a decrease in the revenues that are coming in into the dry cleaning fund.

Mr. Huckstep reviewed the revenues that had been received over the last few years and noted that in 2012 the Program had completed a financial assessment and analysis of the fund, and had determined that with the decrease in revenues coming in, the Fund could no longer sustain any new sites coming in to the program.

Mr. Huckstep advised that as of September 2012, sites submitting work plans were notified that we couldn't guarantee there would be funds to complete their projects. He went on to advise that there were currently 19 active sites in the program and that a lot of them are idle right now because of the structure of the revenues. He noted that many of these dry cleaners would do the work plan, get those costs reimbursed and then apply those costs to continue the clean-up and we have some that are doing some monitoring in active clean up. But, he advised, the majority are at idle status. Mr. Huckstep advised that as of the current date, the Fund has issued 16 completion letters, and has reimbursed over 2.7 million dollars in eligible costs back to dry cleaners and fund balance was currently at \$331,062. Mr. Huckstep advised the Commission that this was the current status and inquired if there were any questions.

Commissioner Jordan referred to one of the pages in the report that reflected the revenues collected over the life of the fund, and inquired as to whether the difference between what was collected and what was dispersed, was it administrative costs? Mr. Huckstep responded that it was; that those costs were for project managers' work, billings, notices and costs involved in collecting and maintaining the fund account.

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

11:29 a.m. – Commissioner Bracker left the meeting.

9. MISSOURI PESTICIDE COLLECTION PROGRAM UPDATE AND OUTREACH EFFORTS

Mr. C.J. Plassmeyer, Compliance and Enforcement Section, addressed the Commission and advised that he would be providing a quick update on the pesticide collection program and outreach efforts. He began with an overview of the 2015 collection efforts and noted that the Department had coordinated with the MU Research Centers for first two events. He advised that the first event was held in Portageville, at the Fisher Delta Research Center on May 30th, and had collected 29,693 pounds of waste pesticide, with 37 participants. Mr. Plassmeyer provided a PowerPoint presentation and displayed photographs of different participants at this event. He went on to advise that the second event took place in Mount Vernon, at the Southwest Research Center, on June 20th. He advised that at that event they had collected 2,293 pounds of waste pesticide, and had 22 participants. Photographs were also provided of this event.

The third event that Mr. Plassmeyer discussed took place in Higginsville, at the Lafayette County Road and Bridge building on July 18th and he advised that they had collected 11,752 pounds of waste pesticide, with 32 participants. The 4th event took place in Owensville, at the City Police Station, on August 15th with 1,795 pounds of waste pesticide collected, with 15 participants. On September 19th, an event was held in Kirksville, at the Public Works Complex, and 3,616 pounds of waste pesticide was collected with 38 participants. He noted that this event was combined with a City sponsored Household Hazardous Waste collection event.

Mr. Plassmeyer provided a breakdown of the types of participants, households, farmers, etc., and how participants had advised they had heard about the program. He also provided an overview of a comparison between the 2014 and 2015 events; noting that in 2014 there had been four events, collecting 21,513 pounds of waste, with 129 participants. And, he advised, in 2015, there have been five events, collecting 49,149 pounds of waste, with 144 participants. He noted that 2014 had more participants per event (32 vs 29), but that 2015 averaged more weight per participant (341 lbs. vs 167 lbs.).

Mr. Plassmeyer noted that with regards to outreach for future events, they were anticipating teaming up with MU Research Farms again; placing ads in local papers in, within a 30 mile radius, placing ads on radio if the proposed areas have a farm station; E-mailing flyers to government agencies in the area; distributing flyers by hand to local Ag facilities; and updating information on the Department's website.

Commissioner Jordan inquired as to where the funding came from. Mr. Plassmeyer explained that these efforts were funded by a Department of Justice settlement with Walmart. He then

inquired as to how much has been spent and how much was left. Mr. Plassmeyer advised that there was still \$2.7 million remaining from the \$3 settlement. Mr. Jordan noted that businesses were interested in this, although they were not eligible to participate, and inquired if some farmers weren't businesses? Mr. David J. Lamb, Director, HWP, responded that Missouri statutes hold farmers exempt from HW laws, but if they are using these as a business, they would be classified as a business.

Mr. Plassmeyer mentioned that a trifold was being developed to promote the pesticide collection program. Vice-Chair Aull asked if consideration had been made regarding putting the handout on line with Mr. Plassmeyer responding that it would be done.

No other 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

Mr. Larry Archer, Public Information office, addressed the Commission and advised that the new Public Information Officer had started work with the Hazardous Waste and Solid Waste Programs, and that the Commission would be meeting Ms. Amy Feeler at the next meeting. He went on to outline what information was contained in the current quarterly report and to note the different topics that were covered in this edition. An opportunity was provided for the Commission to ask any questions they may have regarding the publication.

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

11. LEGAL UPDATE

Ms. Kara Valentine, Commission Counsel, addressed the Commission and advised that she felt that most everyone should have heard about EPA's clean power plan that offered to promulgate a rule that will reduce carbon emissions from coal-fired power plants in each of the states. She noted that over twenty states had already filed a lawsuit against the EPA rule and that last week Attorney General Koster announced that Missouri too will be joining that lawsuit. She noted that the rule was promulgated under the Clean Air Act, but it does have a problem here in Missouri. She advised that a federal court of appeals last week granted a request by several states to stay the rule and that Missouri had joined a lawsuit filed by North Dakota, and that a North Dakota court had stayed the water rule. She stated that 40 states had challenged it and that it was the US Appeals Court role is to clarify which waters fall under the jurisdiction of the Clean Water Act. She noted that it had a huge impact here.

Ms. Valentine then noted that the Missouri Attorney General's office had filed criminal charges for illegal dumping of antibiotic contaminated food waste in Grundy County. She noted that the name of the company is Rapid Removal Disposal, that they're based in Trenton and that there are also two officials of that company who are facing criminal charges. She stated that the company apparently was illegally dumping and the charges alleged the company had been dumping this contaminated feed in 2012 and 2013. She noted that then the

company forged landfill receipts, submitted those receipts to the companies that were customers, for claims, and in those receipts falsely indicated that the wastes have been taken to a landfill for disposal. So, she advised, that case is being handled by the Attorney General's Criminal Division. She also stated that she understood they got a search warrant and they seized the company's computers and did forensic analysis of those computers. She noted that this is something the AGO routinely does in an environmental investigation, and that the criminal charges included illegal disposal and forgery.

She then advised that the AGO's office has asked for a preliminary injunction to force a Kansas City gas station to clean up gasoline contamination. She noted that the gas station is called Inner-City Oil Company, in Kansas City, and concerns have been raised with this facility as the gas has been a nuisance to some of the neighboring homes. She advised that the attorney general made a personal visit to that site a few weeks ago and had filed a lawsuit. She noted that there has been a hearing on a request for a preliminary injunction and are asking the company to either clean up the gasoline release or shut down the business. He noted that she though the attorneys in the case are back in court the following day for an update.

She also advised that the court had recently settled a hazardous waste case with UMKC for violating federal regulations involving the storage and handling of hazardous waste at the Midtown campus in the School of Dentistry. She advised that apparently the University didn't properly determine it to be solid waste or if it contained hazardous waste. She noted that there was a penalty assessed and that the school agreed to pay. She noted that the penalty paid to the EPA is \$23,679.00, and in addition, UMKC agreed to undertake a project to upgrade its hazardous material inventory to come up with a system to better track its hazardous waste. She advised that the system had apparently cost about \$32,000; so, she advised, they had a penalty in the \$24,000 range, then this project for \$32,000. She advised that it was an EPA settlement based on an EPA inspection. She noted that these were the only issues that she had legal updates on at this time

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

12. PUBLIC INQUIRIES OR ISSUES

Mr. David J. Lamb, Director, HWP, advised the Commission that he had not received any requests from the public, to address the Commission.

This was provided as information only and required no action on the part of the Commission.

13. OTHER BUSINESS

Mr. David J. Lamb, Director, HWP, addressed the Commission and began with thanking them for their approval earlier in the meeting on the Order of Rulemaking for the fee rule. He went on to note that funding continues to be an issue the Program is working on, especially related

to our RCRA grant. He stated that funding cutbacks to that grant were a result of a reallocation of the funding, and that since the last Commission meeting, a conference call had been held with the EPA and the other states in the region. He stated that he believed there had been some success achieved with getting them to agree to have a face-to-face meeting to look at the details of the reallocation formula and try to determine if there is a better way to distribute the funds at the regional level. He advised that a meeting would be scheduled sometime in the next couple of weeks. He indicated that he would keep the Commission updated on this issue as more details become available.

Mr. Lamb then advised that he wished to provide an update on the plans to revise the Risk-Based Target Levels for Missouri's Risk-Based Corrective Action Guidance that we utilize in our Brownfields Section. He noted that staff did hold a webinar to start that project on September 9th, and that it was well received. He stated that there were over a hundred people who signed up to participate on that call. He advised that the basic purpose of the webinar was to let stakeholders know what we're looking to do and see who would be interested in participating on a work group as we start to work through that process. He stated that following the webinar, there were approximately 30 people who had signed up to be a part of group. He advised that the first meeting was scheduled for December 9th and that we were optimistic that having stakeholders involved would help us move the process forward.

Mr. Lamb went on to note that, as mentioned earlier by Mr. Eiken, Heather Peters will be making a presentation to the PSTIF Advisory Committee the following week as we move forward with the revisions to the underground storage tank rules. He noted that she's also planning to go to other meetings around the state and that staff have been doing a lot of other outreach efforts as well. He noted that staff would be participating in the REGFORM seminar where there will be a lot of discussion on the "No Stricter Than" rules and on many other hazardous waste issues. He also advised that there would be speakers talking about the two rules that were mentioned earlier in the meeting; the EPA's new generator rule and the pharmaceutical rule. He stated that staff and stakeholders will also be talking about things like the underground storage tank rules, the new process for electronic reporting and other things of that nature. He stated that it really is a good opportunity to provide outreach, as there's usually several hundred people that attend this event. So, he noted, that gives staff a chance to get information out to a lot of people who do not come to our normal stakeholder meetings, and never get to hear about some of these new things that are going on. He advised the Commission that the seminar was scheduled for November 5th, in Columbia, at the Stoney Creek Inn, and the Commission had received invitations to attend should they be interested in doing so. Mr. Lamb had no other issues to discuss with the Commission and ended his portion of the agenda.

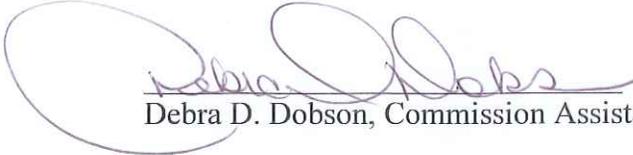
No questions/comments were posed by the Commission. This was provided as information only and required no action on the part of the Commission.

14. FUTURE MEETINGS

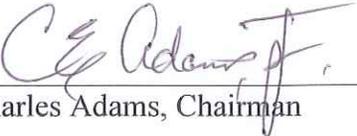
The next regular meeting of the Hazardous Waste Management Commission will be held on Thursday, December 17, 2015, at the 1730 E. Elm Street Conference Center.

Commissioner Jordan made the motion to adjourn the meeting at 11:52 a.m. The motion was seconded by Vice-Chairman Aull. Meeting adjourned.

Respectfully Submitted,


Debra D. Dobson, Commission Assistant

APPROVED


Charles Adams, Chairman


Date