



Meeting Summary Hazardous Waste Forum May 10, 2007

The First Hazardous Waste Forum was held on May 10, 2007, at the Missouri Department of Natural Resources' (department) Conference Center in Jefferson City. One hundred twelve people attended the meeting, either in-person or by telephone conference call, representing hazardous waste generators, hazardous waste permitted facilities, universities, environmental consultants, contractors and manufacturers, several Missouri state agencies, local governments and other interested parties. The agenda and attendance list are available for your reference.

I. Welcome and Introductions:

Bob Geller, Director of the department's Hazardous Waste Program, opened the meeting and welcomed the meeting participants. He asked each meeting participant to introduce themselves. He described the goal of the Forum and stated that all the handouts and presentations for today's meeting are posted on the Forum Web site, located at www.dnr.mo.gov/env/hwp/forum/forum.htm.

II. Goals and Objectives:

Mr. Geller discussed the logistics of the day's meeting. He stated that the Forum is intended to enhance communication between citizens, industry, organizations and the department's Hazardous Waste Program on various guidance documents, policies, rules and other topics concerning hazardous waste. Mr. Geller explained that department staff would be speaking on several hazardous waste topics that he hoped would help the meeting participants. He invited the meeting participants to become involved in other stakeholder workgroups the department is sponsoring, such as the Risk Based Corrective Action Guidance for Tanks sites and the Energy Bill. Mr. Geller hoped the Forum would provide the opportunity to review and discuss existing hazardous waste issues, identify new topics and develop long-term stakeholder input.

III. Departmental Missouri Risk-Based Corrective Action (MRBCA) Guidance

Chris Cady, of the program's Brownfields/Voluntary Cleanup Section, gave a presentation on the department's new guidance for risk assessment and cleanups of contaminated sites, where appropriate. A copy of the presentation is attached.

The MRBCA guidance was finalized in June 2006 and provides a flexible, tiered-approach for cleanup (when appropriate) and management of hazardous waste contaminated sites. Hundreds of sites are now being addressed using this guidance and the Brownfields/ Voluntary Cleanup Section received a record number of applications in 2006. Remaining issues that need to be completely addressed are vapor intrusion, soil types, Tier 2 and groundwater use. The meeting participants were invited to visit the MRBCA stakeholder workgroup Web site for more information at www.dnr.mo.gov/env/hwp/mrbca/mrbca.htm for more information.

IV. Departmental MRBCA Rules

John Madras, Environmental Policy Director of the department's Division of Environmental Quality, discussed the department's MRBCA rules and implementation schedule. He stated that the draft rules should be ready in June. From that point, they will go through the regulatory impact report process, be published in the Missouri Register, go through a 60-day public comment period and another interagency review and

then the formal rulemaking process. Some of the rules will then go before the Hazardous Waste Management Commission for approval and others before the Clean Water Commission.

V. Petroleum Storage Tanks RBCA Guidance

Tim Chibnall, of the program's Tanks Section, gave a presentation on the department's new guidance for risk assessment and cleanups of contaminated petroleum storage tank sites. A copy of the presentation is attached.

The tanks RBCA guidance was published in February 2004 and provides a tiered approach to investigating, assessing and cleaning up (when appropriate) contaminated petroleum storage tank sites. The guidance was revised in March 2005, changing to soil-type dependent, Tier 1 target levels. Several stakeholder workgroups are making additional changes, with a targeted completion date for all actions of March 2008. The department's intentions are to:

- have Tanks RBCA target levels very similar to the department's MRBCA guidance,
- develop tanks RBCA rules,
- schedule reviews for possible updates to guidance and rules, and
- work on long-term stewardship elements.

The meeting participants were invited to visit the tanks RBCA stakeholder workgroup Web site at www.dnr.mo.gov/env/hwp/tanksrbca.htm for more information or to become a member.

VI. Petroleum Storage Tanks RBCA Rules

Mr. Ken Koon, Chief of the program's Tanks Section, briefly discussed the department's tanks MRBCA rules noting the goal of the rules is to clarify basic aspects of the process. Mr. Koon invited the meeting participants to provide their input in the tanks RBCA rule development.

VII. Underground Storage Tank Requirements of the 2005 Federal Energy Bill

Mr. Koon gave a presentation on the Underground Storage Tank (UST) Compliance Act in the 2005 Federal Energy Bill. A copy of the presentation is attached.

President Bush signed the Federal Energy Bill Aug. 8, 2005. Subtitle B of Title XV established the UST Compliance Act. The Act places requirements on states that receive federal Leaking Underground Storage Tank (LUST) funding. Mr. Koon briefly outlined the new requirements for the state that include, but are not limited to, the following:

- Compliance inspections on a 3-year cycle
- Tank owner/operator training
- Public records on tank sites
- Some type of delivery prohibition
- Either secondary containment at tank sites or financial responsibility for manufacturers and installers of tanks and equipment
- Cost recovery of LUST dollars

The meeting participants were invited to visit the UST Energy Bill workgroup Web site at www.dnr.mo.gov/env/hwp/tanks/USTEnergyBill.htm for more information or to become a member.

VIII. Missouri Electronic Scrap (E-scrap) Stakeholder Workgroup

Mike Menneke, of the program's Compliance and Enforcement Section, gave a presentation on the department's creation of an E-scrap stakeholder workgroup in 2006. A copy of the presentation and handout is attached.

The program's work on several e-scrap disposal areas in Missouri prompted discussions with stakeholders on addressing the problem. A framing committee was formed, followed by a stakeholder workgroup. Workgroup participants included electronics manufacturers, vendors, recyclers, environmental groups, waste haulers and processors, universities, public schools, solid waste management districts, several Missouri state agencies, federal agencies, national organizations, local governments, and other interested parties.

The workgroup's purpose was to put in place a framework for disposing, reusing and recycling E-scrap in Missouri in an economically sustainable fashion without threatening the environment. Over the last year, the workgroup developed best management practices (Missouri E-cycling Standards or MOEST) and a voluntary tiered registration program. The workgroup's future goals include education, developing baseline recycling rates for each facility, increasing E-cycling rates across the state along with infrastructure and preventing future problem sites.

The question was raised as to how EPA's Best Management Practices line up with MOEST. Mr. Menneke said that they were both similar processes. Missouri's BMPs are based on those of other states.

IX. Overview of Hazardous Waste Funding

Andrea Kliethermes, Chief of the program's Budget & Planning Section, gave a presentation on an overview of Hazardous Waste Funding as it relates to the overall hazardous waste effort in the department.

Ms. Kliethermes noted the various funding sources used towards Missouri hazardous waste efforts, what general activities are included in the department's efforts and other state agencies that contribute toward these efforts. The Hazardous Waste Fund (HWF) was described in more detail, including revenue, expenditures and fund balance issues. She also presented information on HWF legislative history and its impact on the fund over the past seven years. She provided a comparison of the original lead acid battery revenue projections against actual revenue received and the trends in hazardous waste in state and out-of-state waste generation. The purpose of presenting the funding overview for the department's hazardous waste efforts is the department's desire to work with stakeholders to make sure the department meets the challenges ahead with sustainable funding in order to remain effective.

The question was raised as to whether the projected balances for the HWF take into account the removal of Environmental Emergency Response (EER) funding from the HWF. Ms. Kliethermes said it does for fiscal year 2008 and 2009. The department is not sure whether EER funding will continue to be removed from HWF for fiscal year 2009. Even if it returns, the HWF is anticipated to have a negative balance in fiscal year 2009.

Another question was raised concerning costs for risk assessments. In the presentation, there is a pie chart that illustrates the HWF distribution of funds by agency. The chart shows that the Department of Health & Senior Services (DHSS) receives five percent

from the HWF. During the presentation, Ms. Kliethermes indicated that DHSS develops or reviews risk assessments for the program. *The meeting participant wanted to know how many risk assessments DHSS performs annually.* She explained that DHSS receives a direct appropriation from the HWF for activities in their department. Then they receive funds for activities the Hazardous Waste Program requests. Nearly every section in the program requests work from DHSS, especially Superfund. Ms. Kliethermes did not have a specific number of profiles they prepare annually. *This question will be answered on the Forum's "Question and Answer" Web page.*

A meeting participant brought up Ms. Kliethermes' reference to a stakeholder workgroup for the funding issues the program will be facing. The participant wanted to know if the department will publicize public meetings. The regulated community wants to work with the department to address funding shortfalls, without raising fees (humor). Ms. Kliethermes stated that addressing needs without raising fees has always been a challenge. That is why the department wants to start discussing these issues now. Funding shortages will eventually lead to loss of services provided by the program. She said the department would be happy to start a stakeholder workgroup, if that is what the meeting participants want to do.

X. Hot Topics and Useful Information

A. Long-Term Stewardship

Jim Belcher, Chief of the department's Brownfields/Voluntary Cleanup Section, spoke briefly about the department's Long-Term Stewardship (LTS) initiative. He began by describing the need for LTS because of remaining contamination following some risk-based cleanups. Mr. Belcher then discussed a study conducted by the contractor, DPRA, on the department's existing LTS activities and DPRA's study report. Mr. Belcher then described the planning effort underway to implement the study recommendations.

A meeting participant asked what the bill number was for the Missouri Environmental Covenants legislation. Mr. Belcher stated that it started out as SB388 and is now SB54.

B. Department Information Technology Initiatives

Amber Kreter, of the department's Information Technology Services Division, gave a presentation on several of the department's electronic data projects. A copy of the presentation is attached.

The department is currently working on a permit assistant, an online application that asks a series of questions and helps users determine what permits, certifications, and/or registrations they need for a given situation. The system is 95% complete with a projected implementation date of June 1, 2007. The department is also working on eForms, database system upgrades and an Electronic Contact Management (ECM) system.

ECM is an electronic filing cabinet of documents that will have the ability to capture information from a form and allow the public easy access to department documents. A meeting participant asked if this system is similar to the Arkansas system, where you can see all kinds of correspondence. Ms. Kreter said it is. All documents would be scanned in and available. It was also asked who thought this was a good idea. There were several concerns relating to easy access of information for terrorist groups. The meeting participants wanted to know how the department was going to

protect them. Ms. Kreter explained that some documents would be held confidential. The documents that would be available are those that are already open records. Ms. Kreter assured the meeting participants that the department recognizes that security needs to be a primary consideration.

C. Redefinition of Solid/Hazardous Waste

Tom Judge, of the department's Compliance and Enforcement Section, discussed the proposed rule (72 FR 14171) published by the U.S. Environmental Protection Agency (EPA) on March 26, 2007. A copy of the handout is attached.

If adopted as proposed, the rule would remove a large amount of material that is currently regulated as hazardous waste from solid or hazardous waste regulation (possibly more than 650 million tons by EPA's conservative estimate). EPA proposes to remove from regulation the materials generated and recycled under the control of a single generator or company and materials recycled by third parties through a "transfer-based" exclusion. Wastes burned for energy recovery as fuel, placed in contact with land, or are inherently waste-like (contain highly toxic dioxin and/or dibenzofuran components) would still be regulated, even if recycled. EPA is accepting public comment on the proposed rule until June 25, 2007.

Mr. Judge discussed the possible effects of this rule on the Missouri program, including the elimination of Missouri's Resource Recovery Certification process and the possibility that processes currently requiring permits could become unregulated. Because the rule would be less stringent than current regulation, authorized states would not be required to adopt it.

The meeting participants made several comments regarding the proposed rule and the department's review. One meeting participant stated that the intent of the rule was not to create more Superfund sites and felt that the department's review was extreme. It was suggested to take this in context of the manufacturing process, which already includes many mechanisms to guarantee safety. Everyone was encouraged to read the rule. If the revised definition of solid waste goes into effect, industries should take precautions to individually set up procedures to ensure safety.

XI. Open Session/Discussion Stakeholder Topics:

In this "listening" session, meeting participants provided the following topics, comments and questions. Department staff recorded the topics and agreed to research and consider the recommendations.

A. Comparable Fuels

Issue: *Missouri should look at the "federal rules 261.380 in 1968." Analyze if fuel is comparable to petroleum, it should be used as fuel. This is already happening at the federal level.*

B. Short-Term EPA Identification Numbers

Issue: Missouri needs a process that allows a facility to get an EPA ID Number in a shorter amount of time. Facilities sometime run into soil contamination when moving tanks. They need to analyze the soil and ship it as hazardous waste, if appropriate. It can sometimes take several weeks to get an EPA ID Number. Some facilities prefer to take the soil to a staging facility and use that facility's EPA ID Number to ship the waste. The meeting participant recommended rewording this topic to *restaging waste area*.

Response: Mr. Judge responded that in the event described, facilities could call the department's 800 number for emergency response and get an incident number. Then they could move the soil according to EER's guidance and be in compliance with registration requirements.

C. Emerging Contaminants

Issue: Is DNR planning anything on emerging contaminants like EPA (e.g., pharmaceuticals, hormones and endocrine disrupting compounds)? Some pharmaceuticals contain hazardous waste. These wastes are showing up in water supplies. Is DNR looking at reverse distribution?

Response: Mr. Judge responded that the department is looking at pharmaceuticals. EPA is conducting a pilot program in Missouri regarding pharmaceutical take backs (only one of two in the country).

D. Ethanol Corrosivity in Tanks

Issue: *Is Missouri concerned about the corrosivity of ethanol to piping, above ground storage tanks (ASTs) and underground storage tanks (USTs)?*

Response: Mr. Chibnall said that the department would have to come back to this topic. Other staff, more informed on this issue, will have to be consulted. In addition, Mr. Koon is working on this topic with other states, including Iowa.

E. Multiple Container Guidance

Issue: Missouri should consider changing guidance on satellite accumulation

Response: Mr. Judge stated that this will be discussed later in this Forum meeting.

F. Conditionally Exempt Small Quantity Generator (CESQG) and Small Quantity Generator (SQG) Accumulation Threshold

Question: A CESQG is regulated by the amount of hazardous waste it generates and the amount of hazardous waste it stores. Federal regulations allow CESQGs to accumulate up to 2,200 pounds of hazardous waste and still keep their conditionally exempt status. When a Missouri CESQG accumulates more than 100 kg, it causes them to be regulated as a SQG. What is the spirit of the rule?

Response: That topic will be discussed later in this Forum meeting.

G. Removing or Downgrading Sites on the *Registry of Confirmed Abandoned or Uncontrolled Hazardous Waste Disposal Sites in Missouri*

Question: How can a site be removed or downgraded on the State Registry?

Response: *There are regulations on how to do that and also the Environmental Covenants Act. More information will be provided on the Forum's "Question and Answer" Web page.*

XII. New Guidance, Compliance Tools and Regulations

Kathy Flippin, Chief of the department's Compliance and Enforcement Section, invited the meeting participants to sign up for the Section's hazardous waste generator electronic newsletter, located on their Web site at www.dnr.mo.gov/env/subscribe_eahwg.htm. The newsletter provides its subscribers with information and updates on environmental

compliance from the department. Ms. Flippin also discussed the various items in the newsletter's online archives, located at www.dnr.mo.gov/env/hwp/enf/hw-generator-archive.htm, and department fact sheets, located at www.dnr.mo.gov/pubs/index.html (use the center drop down menu and choose "Hazardous Waste"). The department provides this information to help companies reach and stay in compliance with hazardous waste regulations.

XIII. Regulatory History of Hazardous Waste

Ms. Flippin gave a presentation on the history of hazardous waste regulations from the federal Solid Waste Disposal Act in 1965 to the present. A copy of the presentation is attached.

Ms. Flippin said that the department's goal is to protect human health and the environment. She also stated that regulations may be maintained, clarified, modified or rescinded as long as that goal is met. Ms. Flippin referenced a letter and "Attachment 1" from Mr. Geller, Director of the department's Hazardous Waste Program, to Roger Walker, President of the Regulatory Environmental Group for Missouri (REGFORM). The letter and attachment were in response to a letter sent by REGFORM, requesting to meet with the department to review Missouri's regulations, identify issues and areas for improvement, and suggest changes. The attachment is a slightly modified version of the summary table REGFORM initially produced and includes a list of Missouri regulations that are more stringent than federal regulations. A copy of the department's letter and Attachment 1 are attached.

Department staff met with REGFORM members several times to discuss the list provided by REGFORM. Attachment 1 includes a summary of the actions taken by the program in response to the list. The Hazardous Waste Program modified the attachment into the "Missouri Hazardous Waste Regulation Discussion List" to help facilitate Forum discussions on topics of interest to most generators. Ms. Flippin invited the meeting participants to review, comment and add to the discussion list. This list is a working document, which will be updated as the Forum works through the issues. A copy of the discussion list is attached.

Tim Eiken, the program's Rules Coordinator, spoke briefly about where the department is currently on updating hazardous waste rules. As of Dec. 30, 2006, Missouri hazardous waste regulations incorporate by reference the July 1, 2004 edition of the Code of Federal Regulations. The program is currently working on incorporating federal rules through July 1, 2006. Significant rules in that package include changes to adopt the Uniform Manifest Rule, the Burden Reduction Rule, EPA rule on mercury-containing equipment and the EPA rule on cathode ray tube management. A copy of his handout is attached.

XIV. Discussion List Topics:

See the "Missouri Hazardous Waste Regulation Discussion List" attached. The meeting participants were encouraged to review, comment and add to the discussion list. The first four topics were introduced by the department and Missouri Department of Health and Senior Services (DHSS) staff. The meeting participants provided other topics as noted below.

A. Health Profiles for TSDs

Based on item 4 of the Discussion List, Darleen Groner, of the program's Permits Section, and Gale Carlson, Environmental Section Chief of DHSS's Bureau of

Environmental Epidemiology, gave a presentation on health profiles for hazardous waste treatment or disposal facilities. A copy of the presentation is attached.

According to 260.395.7(5) RSMo, Health profiles are required as part of the application for a hazardous waste treatment or disposal facility. DHSS reviews and approves the health profiles. Both the department and DHSS do not believe the health profiles, as written according to statute and regulation, achieve the goal originally envisioned by legislature. DHSS and the department met to review the value of health profiles, mainly the cost and effort versus valid/valuable results. DHSS is currently gathering information on health profiles. In the next several months the department and DHSS are planning to meeting to discuss the path forward. Ms. Groner invited any of the meeting participants that were interested in attending that planning session to contact her at (573) 751-3553 or by e-mail at darleen.groner@dnr.mo.gov.

A meeting participant agreed that if there is little benefit, this requirement should be changed or eliminated. It is impossible to get a valid profile for people located in rural areas. The participant felt the health profile requirement is very expensive and just a “paperwork exercise.” They believed the requirement should be eliminated.

B. Satellite Accumulation Areas

Based on item 1 of the Discussion List, Mr. Judge discussed the one-year time limit on satellite accumulation and the accumulation start date on containers in satellite areas in Missouri regulation. Mr. Judge reported that the state is willing to consider a longer timeframe such as two or three years, but considers some timeframe necessary. Based on state inspector observations, if given unlimited storage time, some facilities may forget about the containers until they become a safety concern.

A meeting participant commented that satellite accumulation for one year is too stringent, it needs to be longer.

Another meeting participant commented that Missouri’s guidance on satellite accumulation is different from federal regulation and guidance. According to Missouri’s guidance, a generator can use up to one 55-gallon container for each waste stream in satellite accumulation, but the container must be moved off-site or to hazardous waste storage within three days of filling or by the one-year storage time limit—whichever comes first. Sites using smaller containers for safety reasons are at a disadvantage. Mr. Judge stated that department guidance was based on the federal regulation and for safety reasons (i.e., containers did not have to be moved as often). However, the department agreed to consider the meeting participant’s comments.

C. CESQG and SQG Accumulation Threshold

Based on item 2 of the Discussion List, Keith Bertels, of the department’s Compliance and Enforcement Section, discussed why Missouri regulations and federal regulations differ in how much waste a CESQG can accumulate before being regulated as a SQG. In Missouri, a company that generates less than 100 kg of hazardous waste each month, but that accumulates between 100 and 1,000 kg must maintain safeguards beyond what is required by the federal regulations. These safeguards include container and label, storage, inspection, recordkeeping and reporting, and preparedness requirements. The program believes that these safeguards are needed to make sure these larger quantities of accumulated hazardous waste are managed safely.

Because of these extra safeguards, Missouri companies that generate less than 100 kg of hazardous waste per month choose between shipping more frequently to avoid SQG requirements or meeting those requirements. Both choices have cost associated with them. Mr. Bertels stated that the program is willing to discuss the balance between Missouri's additional safeguards and their costs, but want to make sure that any changes remain equally protective.

A meeting participant commented that they feel that the mobilization costs, because of where they are located, cause them to accumulate quantities of hazardous waste that throw them into the SQG category. They would like to see the regulations changed so they can remain in the CESQG category. Another comment was made that if the department was going to keep the threshold requirements, the department needed to enforce them. The meeting participant stated that the department could do a Freedom of Information Act request to find out who's violating the requirements.

D. Container Markings

Based on item 3 of the Discussion List, Patty Chapman, of the department's Compliance and Enforcement Section, gave a presentation about why Missouri regulations and federal regulations differ on when containers are required to be marked. A copy of the presentation is attached.

According to federal regulations, the generator must mark and label the containers before transporting or offering the hazardous waste for transportation off-site. In Missouri, generators must mark and label hazardous waste containers during the entire time the waste is accumulated in storage on-site. Missouri did this for the safety (protection of human health and the environment) of both emergency responders and facility personnel.

A meeting participant commented that the Kansas City explosion used as an example in the presentation was not a hazardous waste facility nor was the material hazardous waste. The explosion involved explosives and was the result of a criminal activity.

A meeting participant commented that storage areas are not clean. It is hard to get labels to stick to containers and the labels cost too much money. Many facilities have to create their own, sometimes at \$1/each or more. Small bottles in labs all require labeling. The meeting participant felt the requirement was excessive. Mr. Geller said the department would review the regulation in consideration of these comments.

E. Quarterly Reporting

Issue: Referring to item 7 of the Discussion List, a stakeholder commented that from an administrative aspect, the required detail in quarterly reports is excessive and quarterly reporting is too often. For example, New Jersey only requires reporting every two years. The reports should be simplified. The codes required on the manifest do not correlate to those required on the quarterly report.

F. Recontainerizing Waste (New Item)

Issue: Transporter and transfer facilities are not allowed to recontainerize waste. They should be allowed to bulk material and combine from many generators.

G. Department and EPA Relationship (New Item)

Issue: There is a disturbing trend in the department's relationship with EPA, particularly with regards to permitting. The department runs the program, but it seems EPA keeps coming out of the woodwork on permits with major changes on decisions made by the program. The changes don't seem to make sense. Program staff seem to be getting overridden by EPA on a regular basis.

Comment: Mr. Geller commented that Missouri is a delegated program and will take these comments into consideration when working with EPA on actions in the state.

H. Department and EPA Inspections (New Item)

Issue: *Universities are inspected by EPA as a large quantity generator (LQG) and by the department as a SQG. Why is this happening? Who is inspecting whom and why this difference?*

Response: The department will look into this issue and follow up with answer on the Forum's Web site.

Additional Stakeholder Comments: EPA inspected university labs. There have been no recent EPA rules that relate to university labs. The next rules on this subject may not be seen until late 2009. The proposed rule is subpart K. Another stakeholder commented that companies have the same issues as university labs and recommended that lab rules be extended to cover private lab facilities.

I. Letter of Credit for Financial Assurance

Issue: A facility representative described the difficulties they experienced because Missouri requires a bank located in Missouri to confirm a letter of credit from an out-of-state bank. Missouri requires that letters of credit must be issued by a state- or federally chartered and regulated bank or trust association. However, if the issuing institution is not located in Missouri, then a bank or trust association located in Missouri must confirm the letter of credit and the confirmation and letter of credit must be filed with the department.

Response: Jacki Hicks of the program's Permits Section stated that the department is reviewing this recommendation in the context of all financial assurance regulations and evaluating what changes may be needed. Because financial assurance is a national priority, Missouri is participating with other states, national organizations and EPA in evaluating all hazardous waste financial assurance regulations. The department will review this recommendation in the context of the national discussion of financial assurance and the changes that may be needed. To address this particular issue, the department has for several years accepted letters of credit from an out of state bank if that bank designates one of its branches located in Missouri for presentation of the letter of credit for payment. Mr. Geller stated that the program would work with stakeholders to address this concern if possible.

J. Generator Registration

Issue: The universal manifest rule requires TSDs to send manifests to the point of origin and destination. The TSDs have found some Missouri generators who have not registered. The TSDs are attempting to address that prior to pickup with the unregistered generator. The stakeholder encourages the department to use

whatever inspection and enforcement tools possible to enforce the registration requirement.

XV. Review Action Items/Next Meeting

Mr. Geller thanked the meeting participants for attending the meeting and fully participating. As mentioned in the opening comments, the purpose of the Forum is to open or continue the dialog. Mr. Geller asked the meeting participants to complete a meeting evaluation form; to comment on anything they liked about the Forum and suggest any areas for improvement. The meeting participants then created an action item list from the day's meeting:

Action Items:

1. Prepare a meeting summary and update the Forum Web pages with the attendance list and meeting summary – Heidi Rice/Jennifer Johnson
2. Look into and answer the open questions noted in italics above – Kathy Flippin
3. Transfer the Discussion List topics, comments, questions and answers to the Forum Web site and designate this as the working document – Jennifer Johnson
4. Ask for volunteers for a RCRA Health Profile subgroup – Darleen Groner
5. Ask for volunteers for a Fees/Funding Subgroup – Andrea Kliethermes
6. Invite hazardous waste inspectors to next Forum meeting – Kathy Flippin
7. Schedule next Forum meeting and provide the Forum members with the meeting information and call-in number – Cheryl Heet