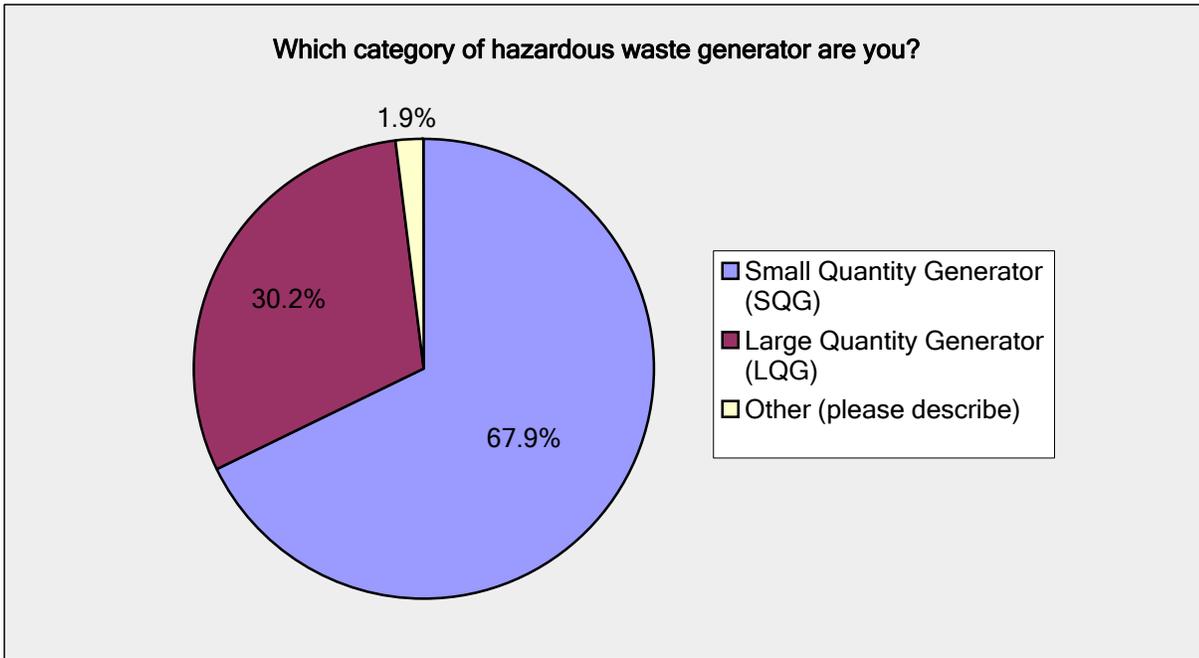


## Hazardous Waste Forum Survey

Which category of hazardous waste generator are you?		
Answer Options	Response Percent	Response Count
Small Quantity Generator (SQG)	67.9%	110
Large Quantity Generator (LQG)	30.2%	49
Other (please describe)	1.9%	3
<i>answered question</i>		<b>162</b>
<i>skipped question</i>		<b>0</b>



Have you attended Hazardous Waste Forum meetings in the past?		
Answer Options	Response Percent	Response Count
Yes	20.4%	33
No	79.6%	129
If no, why and what would help you consider attending these meetings?		88
<i>answered question</i>		162
<i>skipped question</i>		0



Number	If no, why and what would help you consider attending these meetings?
1	travel budget is very limited I do not feel that the HWP is ready to sit down and have a meaningful discussion with regulated industry. I think that the
2	forums are just a show
3	location, and advance notice Approval from General Manager to travel. Meetings are a few hours away from where
4	my facility is. I was not aware of them. if emailed about them would consider going.
5	josh.taylor@labarge.com this is the first time I have received any
6	thing about the forums
7	Location Not sure topics were relevant to our processes. Time away from work is not
8	always possible
9	Location, timing

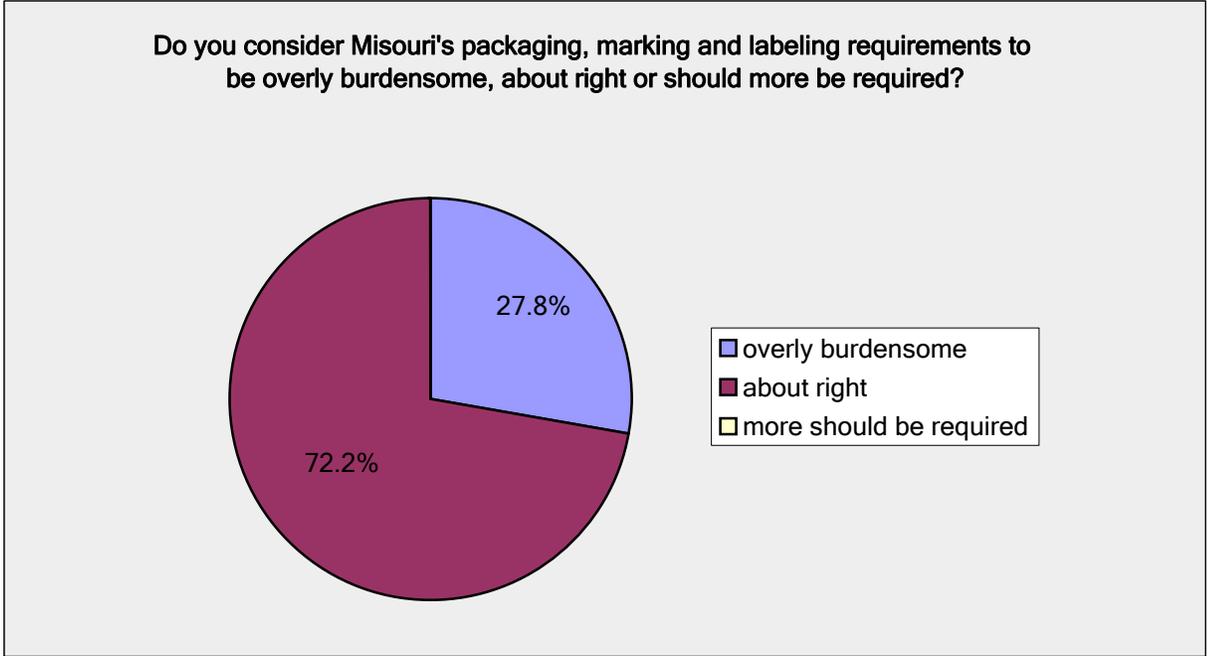
- conflicts in schedules (not enough lead time  
10 to make the plans to attend)  
Need to be in St. Louis or closer to Cape  
11 Girardeau, Mo.  
Travel time and being the sole person  
12 responsible for two sites.  
Busy schedule. An Advance list of meeting  
13 times and places would help.  
We are a small business and finding the  
time to attend is very difficult, because we  
don't have an abundance of people to allow  
14 for me to get away.  
We have very limited haz waste so it is not  
15 a significant effort or concern for us.  
16 Not aware of meetings  
My schedule normally prohibits me  
17 attending  
This is the first communication on this that I  
have noticed. Advanced notice of at least  
18 30 days.  
More notice would help but also the location  
is an issue as we are located in Kansas  
19 City.
- 20 Current workload prevents extra activities  
21 Yes, if held in St. Louis  
Logistics, time availability - Consider  
22 Kansas City sessions
- We generate a small amount every couple  
23 of years. It isn't a big thing for us.  
24 timing hasn't been right in the past  
25 was not previously aware of meeting  
26 Training sessions  
Closer to my area such as Springfield or the  
27 Lake  
not aware of such meetings - value for time  
28 spent would be analyzed
- Travel costs - our company has cut travel  
budgets, so attending meetings like these,  
which would be beneficial to me, is not  
29 seen as beneficial for the entire site.  
I have no knowledge of these meeting. If I  
30 were notified I might try to attend.  
31 Little advanced notice
- 32 Most have been too far a distance to travel.  
33 Unaware of them

- Like most other small companies we have a small staff and we all perform multiple functions. As such it is difficult for us to budget additional hours away from the
- 34 office.  
being able to learn something I don't
- 35 already know
- 36 never knew about them  
As a generator, I will consider attending in
- 37 the future.
- 38 Have never been invited.
- 39 Closer to this end of State
- 40 travel and expense time  
I am located in our corporate office in
- 41 another state
- 42 agencies have not deemed it necessary
- 43 Just notification
- 44 Not clear on purpose; requires travel  
Unaware of their existence, though very interested in attending in the future. Travel distance is a concern. Would be helpful if they could be the same day as MDNR Air
- 45 Forum.
- 46 I was unaware of the time and location.  
Travel time and cost, plus time away from
- 47 work
- 48 This is the first invite
- 49 more advance notice
- 50 On line meeting
- 51 Finding time is a problem
- 52 Had no information about the meetings  
I'm out of state and need enough time to
- 53 schedule the trip.
- Was not aware of the meetings. Would
- 54 attend if required by the Department of VA.
- 55 Closer location to Kansas City  
Did not know it was a requirement.  
Direction from upper Management to
- 56 attend.  
Never heard of them. Prior notice of meeting dates and times. Preferably in the
- 57 KC Metro area.  
I would appreciate knowing the date of the
- 58 meetings earlier.
- 59 Not invited  
Never in a position to do so or that would be
- 60 benefited to until now.
- 61 I'm new to Missouri
- 62 Did not know about the meetings until now.
- 63 Was not aware of dates.

- Workload is too heavy and can't afford to be  
64 away from the office.  
Too far away. Would attend if local, and  
65 given timely notice.  
I have a professional firm that comes in and  
removes my waste according to EPA  
66 regulations.  
67 Advance notice  
I was not aware of the meetings. I will  
68 attempt to attend in the future.  
only person here to write estimates.  
Webinar I would have a better chance of  
69 attending  
It's hard to get away to go to Jefferson City.  
It's a 4+ hour drive for me and almost  
70 always involves an overnight.  
HQ's located in Indianapolis & travel  
71 options are limited.
- The DNR does not convey the message  
72 that they are there to help, just to fine you.  
More advanced notice as we are based in  
73 Indianapolis.  
Job requirements are met by corporate  
74 SOP's  
75 Have not been invited in the past.  
76 No substitutive issues with SQG rules  
have not been aware of any; info on new  
77 state requirements  
78 Was not aware of when meeting was.
- 79 ED MITCHEM DID YEARS AGO. OTHER  
Was unaware of meetings. Location and  
schedule would assist in planning for  
80 attendance.  
Time in which they are offered are not  
always convenient, would be more able to  
use if could access information session at  
81 convenience  
82 Was not aware of the forum meetings  
We produce a very small amount. It is not  
83 economical to attend.  
Consider holding them regionally to hold  
84 down time and travel expenses.  
85 Time and place are inconvenient  
86 Just simply too busy
- 87 Notification of event for planning purposes  
88 I was unaware of them

**Do you consider Missouri's packaging, marking and labeling requirements to be overly burdensome, about right or should more be required?**

Answer Options	Response Percent	Response Count
overly burdensome	27.8%	45
about right	72.2%	117
more should be required	0.0%	0
<i>answered question</i>		<b>162</b>
<i>skipped question</i>		<b>0</b>



If overly burdensome, how do you suggest that safety information could be visually conveyed in a simple and reliable manner?	
Answer Options	Response Count
	41
<i>answered question</i>	41
<i>skipped question</i>	121

Number	Response Text
1	Most containers are already marked identifying the contents, usually from satellite accumulation areas.
2	Simplified hazardous waste labels with just basic information for handlers and emergency responders during storage. Labels containing all the extra DOT information, manifest number and incinerator ID requirements can be applied on shipment day before loading the truck.
3	satelite areas require start dates, unlike other states. Waste has to be packaged to DOT requirements and be ready to ship while in 90 day area.
4	If you are talking about visually conveying drum contents to first responders, this is something that would have to be done outside of a storage area. First responders are not going to enter an area that they believe to be unsafe. If they do not know what wastes they will be dealing with before they enter, I think it is safe to say that they will not be entering. So, by having a drum marked with the appropriate DOT label in a storage area is not going to give a first responder any visual safety information. Having a detailed inventory that is available outside of the storage area would be more helpful than DOT labeling on containers.
5	As a generator of lab-scale, primarily labpack waste quantities, this requirement forces generators to package and seal labpacks prior to being filled. While the DOT diamond is the best marking to visually convey safety information, other DOT markings/labelings, and the requirement to be transport-ready (i.e. a sealed outer lab-pack container of a combination package), is unnecessary and burdensome if the inner package can be closed adequately.

Labeling is not an issue. By complying with this, it also complies with OSHA hazcom labeling. So we feel that labeling once at the point of generation actually saves time.

□

RE: packaged per dot; □

We struggle with this. The vast majority of our waste is destined for lab pack. Our contractor along with trained employees segregate wastes for labpack the day of shipment. This ensures that we agree on compatibility issues.

□

As long as the "inner" pkg is in compliance, the reg would be more easily applied if it were, "packaged, marked and labeled per DOT before offering for transportation. And while in storage, the primary (intended inner) container shall be in compliance with DOT combination pkg

6 requirements while in storage.

our primary waste stream is an alcohol xylene mixture--sat

7 labeling is always a problem

Require marking of HAZARDOUS WASTE, NAME AND START ACCUMULATION DATE. or full DOT info as

8 optional.

simplify the regs. reduce the amount of references and exception. make them understandable to shipping people,

9 not just compliance experts.

A general label stating what it is - but not require the DOT labeling piece. To be compliant, our facility buys labels and fills them out per regs, then our hazardous waste company brings THEIR labels (so they know things are labeled correctly before being placed on the truck for transport) - so our label (and time) is essentially wasted and all of this also costs money. The other issue we have run into in the past is having a mixture of waste that we get tested because we really have no idea how it should be labeled per DOT, so I risk "improper labeling" while waiting on test results to come back even though I have it clearly marked as Haz waste and the mixture of items in there as

10 well as the start date.

Label container with what the product contains. Why on earth would you need to have additional labeling? if people are so worried about how emergency responders will

11 respond to it, maybe we should just store it at the fire dept.

In addition to the words "Hazardous Waste", it is suggested MDNR require the specific material (example-isopropanol) or class of materials (mixed solvents). In most cases, this would provide the best information to a local responder than the extensive information required to meet DOT

12 requirements.

Packaging is cumbersome. As a LQG, frequently it would be helpful if the 55 gallon limit could be increased by

13 allowing 2-3 drums to be used sequentially.

It is almost impossible to store a labpack with the proper DOT shipping containers prior to the containers being shipped. If a new chemical becomes waste and can be added to the labpack, it becomes necessary to relabel it because often the DOT shipping label changes. Often waste haulers want to sort/visualize the labpacks personally resulting in shipping containers being unpacked and repacked unnecessarily. All containers in the CAA should be labeled "hazardous waste" with the start date of accumulation. They can be labeled in accordance with DOT requirements immediately prior to shipping (which is

14 when the DOT rules become effective).

Just follow federal guidelines. Place "hazardous waste" satellite accumulation labels on two opposite sides of the

15 satellite accumulation containers.

16 I see nothing wrong with the labeling procedures now

17 N/A

Limit the requirement to containers that are 5-gallons or

18 larger in size or follow the federal requirement.

1. We contract with a licensed hazardous material disposal company to package our lab pack items-expired chemicals, excess, label per DOT requirements, and prepare the manifest the day of shipment. They can be sorted and stored appropriately: acids and bases in labeled corrosive cabinets. Solvents in a solvent cabinet. The cabinet can be labeled for contents. It is not overly burdensome for the

19 two main solvent waste streams generated daily.

I think that one label should be able to be used for the entire time on site. Instead of having satellite/storage container labels, and then having to put the waste company's shipment labels over them when preparing for shipment off site. As they all have the DOT information on them. The only additional information on the shipment

20 labels are the manifest number.

For drum waste streams this is not a problem but for lab packs is where I have issue. As lab pack waste is accumulated it is not practical to package the waste as you go. It is best to segregate the lab pack waste according to compatible hazard class in toots and right before shipment package the waste according to DOT shipping requirements and disposal facility requirements. For us it works best if the vendors we use bring packaging material on the date of shipping and pack and ship the same date.

□

For us what would work best and still meet your requirements for lab pack is that each individual lab pack container has the name of the chemical it contains on it. The individual lab pack item or the toot the lab pack items are in be labeled with the date of accumulation first started and the words "Hazardous Waste". For information for first responders the toots could be labeled with the DOT shipping label that applies to the material inside the toot

21 (for me a temporary label that I can reuse works best).

22 Compliance with Federal regs is sufficient

Reduce the paper work volume; require suppliers to submit all paperwork if their customer is the end-user and/or does

23 not resell material.

24 N/A

25 no

The hazardous waste regulations are not about worker or responder safety, they are about environmental protection. It is outside of the authority of RCRA to be attempting to address this. OSHA is the appropriate agency to address worker/responder safety. The use of regulations intended for information while in transit, in any other context, is a

26 misuse of those regulations.

Full DOT markings and labels should not be required during accumulation. The RCRA labeling requirement for the words "hazardous waste" and the accumulation date is sufficient during the accumulation phase. I always seem to have to relable / cleanup labels anyway when a drum is moved to storage that it seems to me to be a waste of labels to require full DOT at every step of a hazardous

27 waste containers lifespan.

28 Federal Regs.

In my over 36 years of hazardous waste experience and HAZWOPER compliance, I have found that most incidents involving hazardous material/waste are serious enough that responders cannot get close enough to read container labels. OSHA requires MSDSs on all hazardous material and EPCRA requires them to be readily available to responders... require simple WSDSs (Waste Safety Data Sheets) that contain the information that would have been on the DOT Label, accessible in the same manner as the

29 site MSDSs would be.

The contents of the package, date of accumulation, and hazardous waste marking should be placed on the container while the waste is being handled and in storage

30 on-site.

Just use NFPA labels on the shelter like any chemical storage area.

31

Adopt the Federal rule as written, to apply to transport only, not accumulation.

32

33 the hazardous waste label is sufficient

Missouri's requirements are excessive compared to the federal regulation and other states. Safety information could still be available simialr to Hazcom information.

34

"hazardous waste" is sufficient. Waste by its nature is offer not pure and mixture of various known and unknown chemicals at concentrations not usually known. So the notion that a DOT label always provides useful information

35 is misguided.

DOT labeling for articles in storage seems superfluous for our site. Information about waste type and hazards can be obtained from other sources, such as our waste inventory listing and descriptions. This would be available to our on-site HAZMAT personnel in the event of an emergency

36 involving containerized waste in storage.

may be to LQG, if timing is an issue. DOT driver and generator may not agree on specific classification of waste

37

The name of the material conveys the information needed at our site. Tier II information conveys what we have on site and hazards to LEPC and Emergency response personell. We would lkike to wait until the material is ready to ship to mark them with DOT labeling due to changes as material is

38 added to the containers.

As is already required under EPCRA, federal RCRA contingency plan and first responder site familiarization requirements, local fire codes, LEPC involvement, Part B

**39** permit conditions, etc.

**40** Allow placards be posted on the outside of the storage area

**41** Use NFPA or HMIS system for intermediate storage.

If about right, can you suggest any improvements or simplifications?	
Answer Options	Response Count
	51
<i>answered question</i>	51
<i>skipped question</i>	111

Number	Response Text
1	no improvements come to mind
	I feel more information is better. It does not take much time to include all required information. the label i use has a line for everything including start and stop accumulation dates. then when transfereing to 90 day holding i put a different
2	label that specifically states it is shipping
3	None
	Having item properly labeled at all times here
4	dispell any confusion as to what the item is.
5	No
6	None
7	No
8	No
	My company does not generate that much waste
9	and it normally gets hauled about once a year.
10	Stay consistent with DOT. Don't add, don't detract.
	No, we are accustomed to the current
11	requirements.
	No, our hazardous waste hauler provides preprinted labels onto which we write the
12	accumulation start date. It's simple.
	I do have trouble with the label being correct during accumulation. the container is relabeled for shipment because of the change in manifesting
13	requirements.
	I don't think the EPA HW label is necessary until
14	ready to ship but everything else should be there.

Although our State follows federal regulations our Company puts the DOT information on the Haz-Waste Label for information for anyone to see. In the event of an emergency for a leak or spill first responders etc, may not be able to get close enough to read the info on the container anyway and will have to get the information from the

- 15 Generator before getting too close.  
It is just as easy to properly label the containers with both RCRA and DOT labels and markings
- 16 than to do it at separate times.  
Marking the waste the entire time in the same fashion it will ultimately need to be marked makes
- 17 sense.
- 18 none
- 19 no i'm good with it.
- 20 No
- 21 None. All has to be done before transport.
- 22 no

- 23 Allow the optional use of NFPA or HMIS labels in lieu of DOT hazard labels for container storage.
- 24 No

This is a good system. Containers need to be labeled when put into service, no argument. If the label contains all of the information that eventually will be required, then multiple labeling steps and

- 25 accidental violations are avoided.
- 26 na  
I have no suggestions and feel that Missouri requires an adequate amount of attention that follows EPA regulatory requirements for
- 27 packaging, marking and labeling.
- 28 no
- 29 not at this time

- 30 I think it is good, it lets us know when the drum was completed, and when the drum was labeled.
- 31 better examples to follow should be shown
- 32 Seems to be ok at this time
- 33 None at this time
- 34 No
- 35 None
- 36 NO
- 37 No

- 38 The current law is not burdensome for the main solvent waste streams routinely generated daily. It is for the items we lab pack (expired chemicals, excess) that are generated sporadically.

- Sometimes it takes our consultant a few days to classify our waste and tell us if it is DOT, State or EPA regulated or not. It can be difficult to label
- 39** waste until proper classification is determined.  
None come to mind. We have trained our folks on both the RCRA and DOT requirements and it
- 40** works fairly well.  
Follow the federal language for marking and
- 41** labeling during accumulation.  
As mentioned, I have a professional firm that
- 42** removes my waste.
- 43** No.  
Clearer definitions of what needs to be on the
- 44** labels  
put out simple information mailers that would help
- 45** non regulators understand what you want  
Process appears to meet needs of shipper and
- 46** packager.  
Process seems to work well for the waste I
- 47** generate
- 48** No change is needed.
- 49** None
- 50** No suggestions
- 51** No

If more should be required, what and why?	
Answer Options	Response Count
	2
<i>answered question</i>	2
<i>skipped question</i>	160

Number	Response Text
1	N/A
2	N/A

Any other options or comments regarding packaging, marking or labeling?	
Answer Options	Response Count
	24
<i>answered question</i>	<b>24</b>
<i>skipped question</i>	<b>138</b>

Number	Response Text
1	Containers for the accumulation of waste in the 90 day storage area must be managed as in storage and not satellite accumulation. There needs to be a way to allow the accumulation or processing of waste that is not regulated as storage.
2	Address the reuse of "inner" containers. For instance: an empty solvent bottle, reused to manage the waste before lab pack. The expence to purchase new bottles / containers when the empty bottle is going out as hazwaste anyway and can be used as an inner for the lab pack.
3	We have no problem with the current system. Labling the drum is pretty easy since we use the same labels as used when they pick up the sample.
4	make regulations understandable to shipping people.
5	Could require the DOT sticker to communicate the hazard rather than the whole DOT description.
6	No
7	Clarificiation. It seems as though OSHA and other regulatory agencies emphasize regulatory assistance visits over enforcement. I know many hours & \$\$ are spent trying to interpret the regulations and fit them into specific facilities. Additional assistance (i.e. - on site or confidential Q/A's) would be greatly appreciated.
8	Satellite accumlation labels need an area for a "full" date to be placed on them.
9	It is the DOT requirement.
10	No
11	None
12	NO

We are a small lab. We do have small amounts of hazardous materials that are lab packed as needed. We contract with a licensed hazardous waste company who properly packages, labels and marks the containers per DOT regulations for shipping

**13** the day of shipping.

A period should be allowed for waste classification. During that period the waste could be labeled indicating classification is PENDING. The date waste is in classification period should be tracked by owner and permission request made by owner and submitted MDNR to extend

**14** classification period if needed.

Allow for reasonable processing time for incoming materials (i.e., hazwastes), e.g., 72 hours, before enforcement of labeling

**15** rules.

This rule was reactionary to a single incident many years ago. First responders no longer enter dangerous areas, and especially potentially dangerous chemical areas. Years of HAZWOPER training has taught them different skills. I challenge MDNR to find a fire department in Missouri that doesn't train every responder to at least the HAZWOPER technician level. The Federal marking of "Hazardous Waste" would be sufficient to trigger a step-back

**16** approach to the facility.

I wish the phrase "Accumulation Start Date" were more clearly defined. I've seen it used as a "first drop date", as a "fill date", and as a "move to storage date", depending on how we think the inspector will interpret it, and a DNR inspector will often give a different interpretation that an EPA

**17** inspector will.

**18** no

The small DOT label on a drum can not be

**19** seen in a fire in a shelter.

This is an important and beneficial change that could be made in Missouri. Please do

**20** not delay further.

If its such a great idea to require full DOT marking/labeling, how come Federal EPA is not pushing it? How come no other State is pushing it? Answer, cost to implement > greater than real life benefit. Its okay for Missouri to have special rules, but only

**21** when truly justified and appropriate.

Require only visible DOT label as best judgment in classification when retained in

**22** temporary storage.

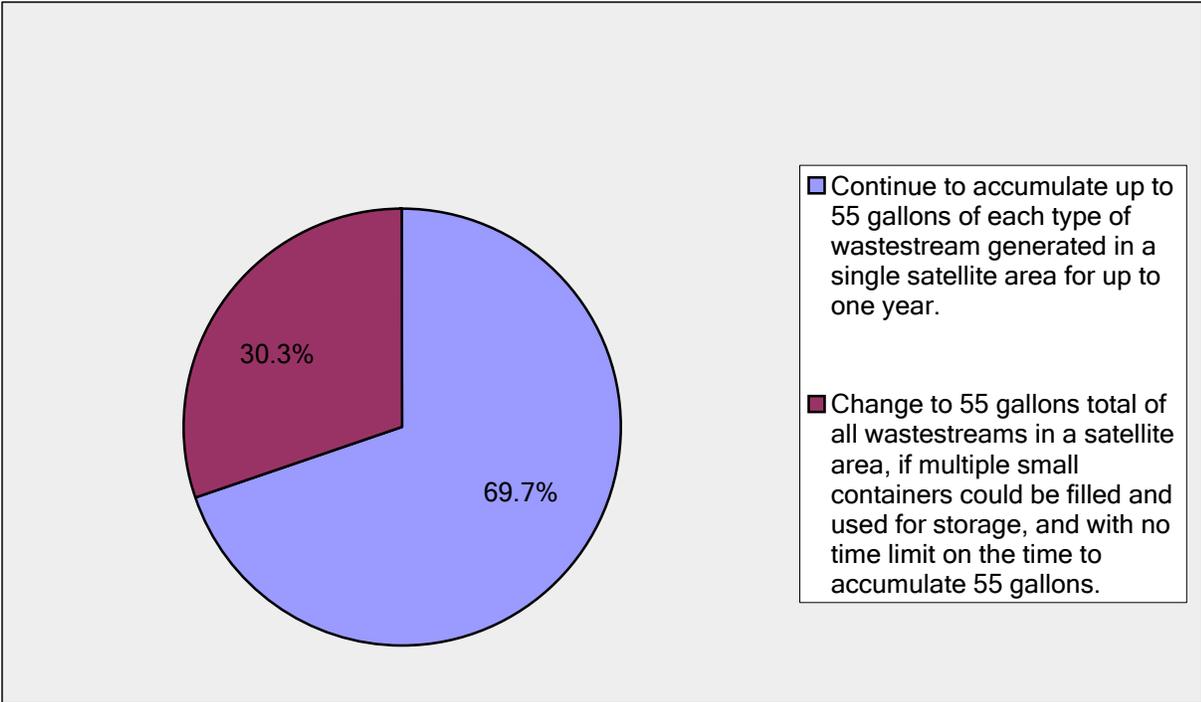
**23** No

We used premarked labels and apply them

**24** to the 55 gallon drums. It is pretty simple.

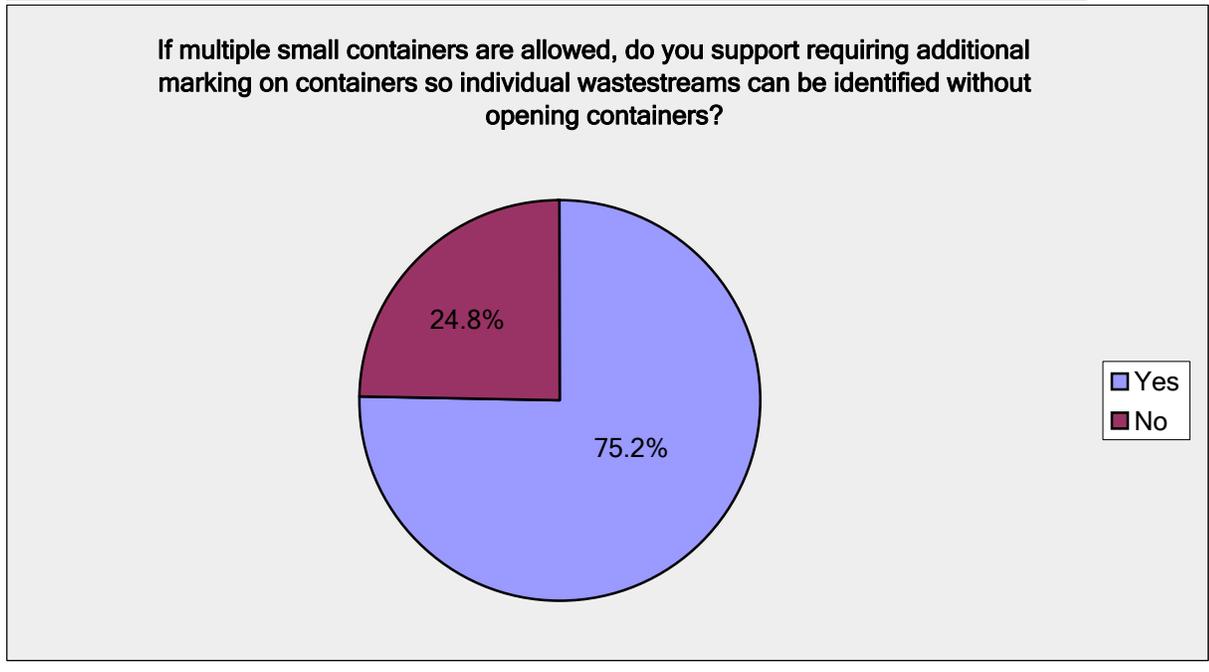
Do you want to continue being able to accumulate up to 55 gallons of each type of wastestream generated in a single satellite area for up to a year, or would you prefer to have no time limit but be limited to only 55 gallons total of all wastestreams in a satellite area, if multiple small containers could be filled and used for storage?

Answer Options	Response Percent	Response Count
Continue to accumulate up to 55 gallons of each type of	69.7%	101
Change to 55 gallons total of all wastestreams in a	30.3%	44
<i>answered question</i>		<b>145</b>
<i>skipped question</i>		<b>17</b>



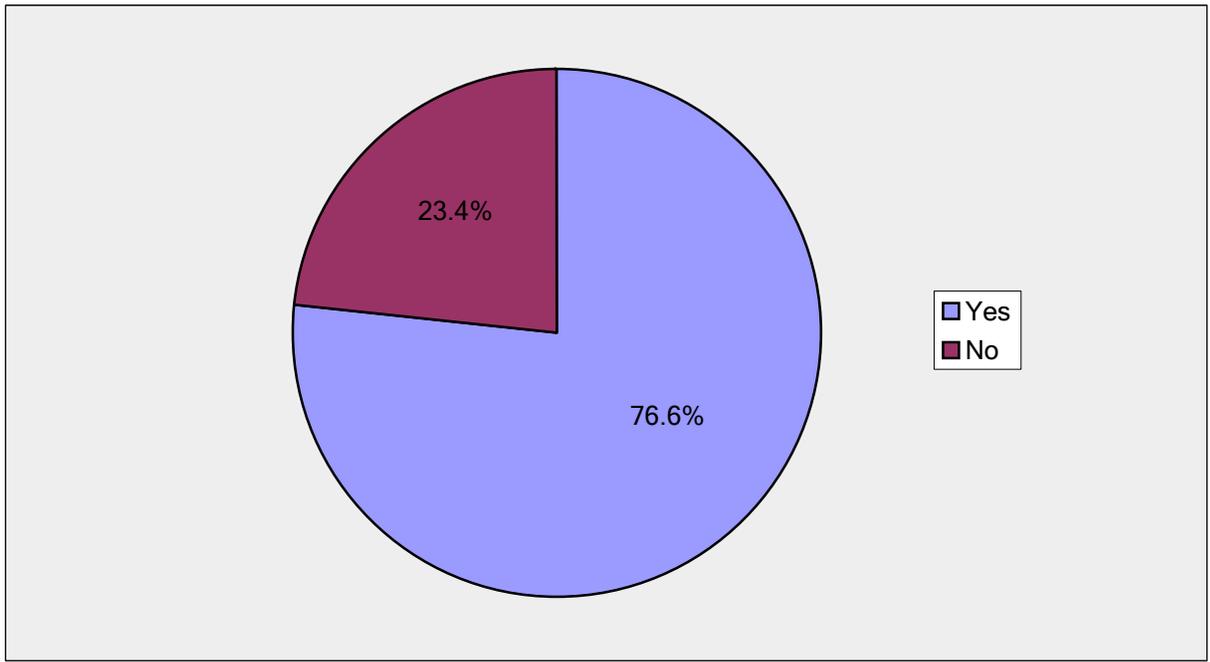
**If multiple small containers are allowed, do you support requiring additional marking on containers so individual wastestreams can be identified without opening containers?**

Answer Options	Response Percent	Response Count
Yes	75.2%	109
No	24.8%	36
<i>answered question</i>		<b>145</b>
<i>skipped question</i>		<b>17</b>



If multiple small containers are allowed, do you support requiring that only one container at a time be filled for each wastestream and that, when filled, each container be marked with the day that you started accumulating waste in that container so it does not have to be opened to determine how much it contained?

Answer Options	Response Percent	Response Count
Yes	76.6%	111
No	23.4%	34
<i>answered question</i>		<b>145</b>
<i>skipped question</i>		<b>17</b>



**If multiple small containers are allowed, do you have any suggestions for how new marking should be required to identify the type and amount of waste being accumulated in the satellite area?**

Answer Options	Response Count
	62
<i>answered question</i>	62
<i>skipped question</i>	100

Number	Response Text
1	I don't think the amount in the container is an issue. In a majority of instances, each container will be used until it is full and then moved into storage. I would recommend only marking the container to identify the contents and not labeling with dates or amounts.
2	The hazardous waste labels are adequate in my opinion, with signs identifying the satellite accumulation areas.
3	Mark all container with content description and date started on first use.
4	No new markings
5	No
6	Each be ID'ed
7	If individual containers are too small for a label, place them in a labeled secondary container.
8	DOT markings
9	No
10	No suggestions, just keep it simple.
11	No
12	Have the total qty of each container capacity marked in the satellite area. If it equals more than 55 gallons then some of the containers to be moved out of the area..
13	We already identify the type of waste stream on our hazardous waste labels.
14	We would not need multiple containers. We only have one stream.
15	Consider a posted key or listing to identify each wastestream by a distinct color, which would correspond to the color of the small container for each wastestream.

- Have a profile reference number on the container that refers to the waste profile document that lists all wastes allowed.
- 16  
17 try to make it as simple as possible.
- Confused by "amount"... a "common" name that both the accumulator and the waste manager understand, combined w/ a DOT shipping name should be sufficient.
- 18 label the container with the product contents
- 19 Label according to Fed guidelines - Material name, whether haz or not, but dont worry about amount or date. Should eliminate 1yr time restriction. Generator is restricted to
- 20 55 gal max.
- 21 A running total should be kept not really just be consistent with what has been done in the past so it doesn't add
- 22 additional confusion
- I would like to see the flexibility of using multiple small containers in a single area for two reasons: 1. Ergonomics-handling 2.5 gal containers is much safer than moving larger 55-gal containers; 2. To ensure incompatibles are not mixed; and 3. Especially for a laboratory environment, this works better when you have small equipment, i.e., HPLCs, connected to a single waste receptacle. Having multiple small HPLCs requires having multiple small waste receptacles.
- 
- The marking would be the same as is currently required for satellite storage with the words "Hazardous Waste", a start date and a specific description of the chemical or
- 23 class of chemicals.
- 24 no
- "Satellite Container" and contents marked
- 25 on the top and side of the the container.
- 26 perhaps just idenify and hazard label
- 27 Same as large containers
- 28 no
- I would suggest that no containers smaller than 5 gallon containers be allowed to be
- 29 used to store accumulated waste material.

Waste xyz (1 of 2) Accumulation start  
date\_\_\_\_\_

30 Waste xyz (2 of 2) Accumulation start  
date\_\_\_\_\_

31 Keep it the same as drums. Keep it simple.

I dont' understand your questions, how  
would opening a container tell anyone how  
32 long the waste had been accumulated?

Add a "full date" on the satellite  
accumulation label.

The label tells operators what is in the  
container, the full date would tell them to  
33 start filling a different container.

All containers to be marked for contents  
34 and date

Yes...DOT & RCRA regulations must be  
35 follow.

36 No. What is in place is fine.

37 Does not apply to us.  
same labeling requirements as we have

38 now  
Apply same existing rule to small

39 containers.

40 NO

The laboratory has a form which lists the  
type of waste that is being put in the  
satellite container as it is being put in. Most  
of the satellite containers are the same or  
similar solvent waste from multiple HPLCs  
whose contents are transferred to the 180  
day accumulation when the 3 to 5 gallon  
container is full. We have about 30  
satellites which are checked approximately  
once a week on which should be  
transferred. Contents are recorded on a  
form. A form is also used to tracked which

41 have been checked and which transferred.

As far as labeling requirements I would  
require date on each container when  
accumulation started, the words  
"Hazardous Waste", and a list of the names  
42 of the chemicals it contains.

Something visual such as different colored  
labels so you can identify the container

43 from a short distance.

44 Follow existing RCRA regulations

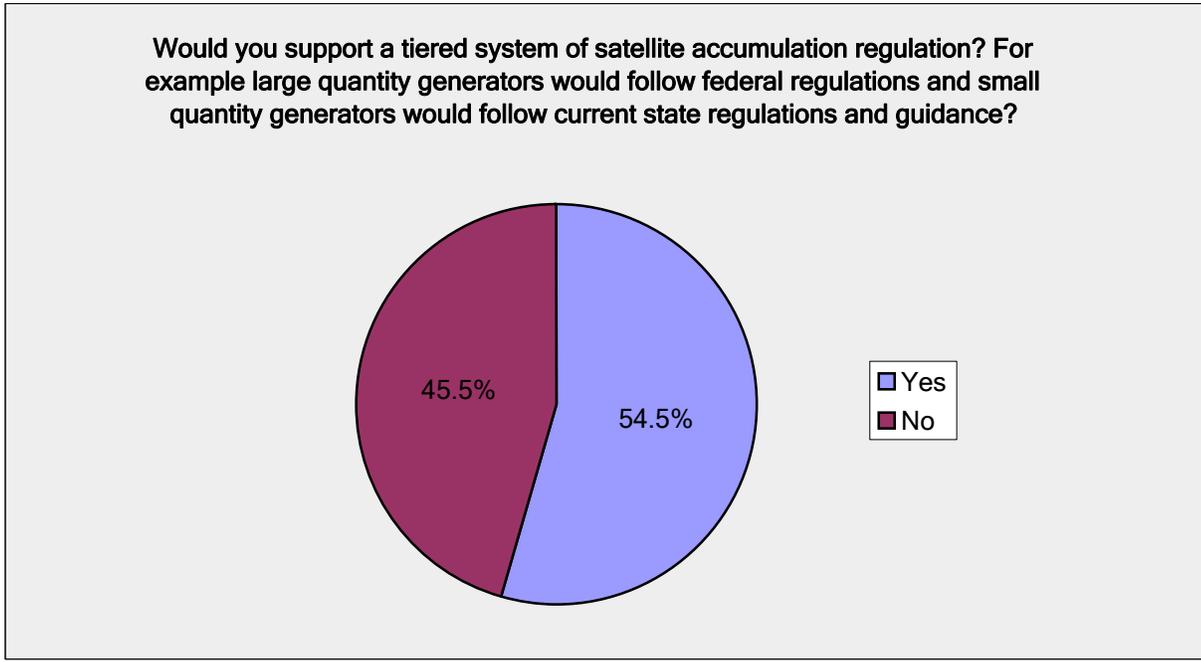
45 follow federal guidelines for labeling

46 basic label, waste, accumulation date

- markings provided by suppliers, so "local" operators do not have to create these
- 47** markings.
- 48** No
- date container started, list of material(s)
- 49** therein;
- 50** Straight Federal Rules.
- No... but I am strongly not in favor of
- 51** multiple small containers.
- 52** I do not support multiple small containers.
- 53** label
- Mark with date, content, satellite accumulation hazardous waste and tracking mechanism to determine volume for each
- 54** container of waste generated
- MAK WITH DATE, CONTENTS,  
SATELLITE ACUMULATION AND  
TRACKING RECORS TO KEEP TRACK
- 55** OF TOTAL VOLUME
- Follow the federal rules. Why make this
- 56** hard?
- Adopt the standard USEPA interpretation of
- 57** this regulation to eliminate confusion.
- Information on containers should be similar
- 58** to hazcom information
- Why are we looking for something to invent here? Not a Federal EPA requirement, not found in other States that I am aware of, why does Missouri need to be different. Question, in the past 20 years, how many first responders where injured by satellite
- 59** accumulation areas?
- We know how long it takes to fill our containers and we implement a time limit on ourselves to empty container before the container could possible be filled. We
- 60** simply empty our containers each day.
- Each storage label should have description, physical state, start date of accumulation & generators name and address. Qty by month could be on a sepearate sheet in
- 61** area.
- 62** same markings as the large containers

**Would you support a tiered system of satellite accumulation regulation? For example large quantity generators would follow federal regulations and small quantity generators would follow current state regulations and guidance?**

Answer Options	Response Percent	Response Count
Yes	54.5%	79
No	45.5%	66
<i>answered question</i>		145
<i>skipped question</i>		17



Any other options or comments regarding satellite accumulation regulations?	
Answer Options	Response Count
	42
<i>answered question</i>	<b>42</b>
<i>skipped question</i>	<b>120</b>

Number	Response Text
1	No
2	This is a very good idea.
3	Come on guys, lets keep this simple! Allow other satellite areas to combine waste, reduce the number of containers in adjacent laboratories that generate the same
4	waste.  Leave the system as is and avoid making
5	things more complicated and confusing. Allow 55 gallons for an extended period greater than one year. Would save \$\$ for small generators with waste streams that do not generate rapidly. If more rapid generation they would still have to move to
6	storage area. simplify - don't change them and make them more complicated. change them to make them more simple -- read one
7	document and be able to understand. Too confusing for folks to remember this if
8	they went from SQG to LQG

The current requirements seem to work well for all generators, I am not sure what if any gain for safety there would be to changing the current system to something harder to understand and to keep in compliance with so many different smaller containers and additional labeling requirements, keep it simple. If it takes you a year to fill a drum then use a smaller container and ship it out more often, I think the requirement reads up to a 55 gal drum but doesn't restrict using a smaller one if it works better, no need to change laws when it already allows flexibility depending on the generator's accumulation pattern. If a generator wants to have smaller containers for a waste stream and keep his amount below 55 gals total he can under current regulations, Say you have a generator that fills a 55 gal drum every three months, ships it out and starts over, By changing the law he would now have to use a smaller container and ship it out maybe every two or weeks. He will not  
9 be happy.

Question #5 would add confusion to the system.[]

No time limits would allow the sat. accum. cont. to be filled b-4 transporting thus minimizing excess cost of transporting smaller quantities of material along with minimizing exposure in the transportation system (4 small shipments compared to

10 One regular sized shipments).

The one year limit is a burden. May not generate a 5 gallon bucket but have to ship

11 off.

The proposed multiple small containers would really impact our operations. Our small containers are 30 gallons. We currently keep 3, one for each waste stream in the satellite area. They are changed out weekly so the year limit doesn't affect us. If I could only keep one waste stream at a time in the satellite area, how can I manage

12 3 waste streams?

13 nope

The key requirements are that waste is safely stored onsite and disposed offsite in a timely manner. I believe it's important to build in as much flexibility as possible. No two processes are alike and what works well for one may not work for another. I would like for the State to be less prescriptive and require a few basic items as mentioned and then leave it up to the industry to have a documented method for complying with the desired outcome.

14

15 no

It seems that all generators should follow

16 the same guidelines

17 No

Print Best Practices and have on-line digital  
□

18 pictures of clean, well-maintained SAA's.

We intend to follow the Academic Labs

19 Rule guidance when Missouri adopts it.

Again, the concerns come down to 'at or near the point of generation', and '55 gallons'. At or near the point of generation may be at the end of an entire line, and this may well be the safest and most logical accumulation point. However, current understandings of regulations often conflict with insurance requirements, making a

20 clearly defined solution murky at best.

Need the ability to collect a small quantity of hazardous waste, in 5-gallon containers or less, during an 8 hour shift, in properly labeled small containers for disposal into satellite accumulation points at the end of

21 shift.

Test for reaction of the chemical to the

22 containers so leaks can be prevented.

change always causes confusion. It would

23 be nice to leave things as is.

24 use federal regulations

25 None

26 No

27 NO

I am not in favor of changing this regulation. We have multiple containers of 3 streams that we utilize satellite accum for and all are in 55-gallon drums. This proposed change

28 would negatively impact us.

I strongly support Missouri's goals to have the generated waste handled in a safe manner. I do believe that small analytical laboratories generate small amounts of

**29** different types of waste.

Not allowing more than one waste stream in the satellite area would be very burdensome for our company. We fill them at a rate of approximately 1 of each wastestream a week, and it would be extremely difficult to keep it down to 55 gallons in each area. It would create the need for multiple satellite areas (one for each wastestream), which would be

**30** pointless.

We have solvent waste accumulated in 1 gal jars in the lab. It doesn't make sense to require a pick up each time one of these jars is full. They have storage in their cabinet to hold several 1 gal jars, it makes more sense to pick up multiple jars at one time. For us we never have more than 5 1-gallon containers total at a time but for others I could see this needing to be a

**31** higher amount.

**32** Follow existing RCRA regulations

The questions on this page are leading questions. (A leading question is a question that suggests the answer.) They are written to get the answers MDNR wants to hear - instead of being neutrally presented to get a

**33** fair pulse of the regulated community.

My facility has numerous production areas generating multiple streams of hazardous waste, any one of which would classify us as a large quantity generator. We fill 55-gallon drums in a matter of days - the one year accumulation limit has never been an issue. However, if this proposal is going to require me to stop using a 55-gal drum for each stream at an accumulation point, then it is going to cause an unreasonable problem, adding unnecessary labor and handling to what is now a smooth process. I can see how a generator who didn't accumulate very much of a given stream would want the option of smaller containers and more time, but please don't make this mandatory. Allow me the option of an efficient accumulation of large quantities of hazardous waste.¶

And what in the world are you talking about when you say "Federal regulations do not have a time limit"? Is that some kind of a

34 joke?

Generator size has no bearing on the severity of the waste being accumulated in Satellite; consequently, I believe the

35 Federal Regulations are more appropriate. keep the 55 gallon limit because this size is most often shipped. smaller containers will cost more in labor because of transfer time

36 and frequency.

Satellite accumulation regulations offer a great option for the generation of small quantities of hazardous waste in terms of

37 on-site management and cost control  
SATELLITE ACUMULATION OFFERS A  
GOOD WAY OF STORING SMALL  
QUANTITIES OF WASTE OVER A LONGER

38 PERIOD OF TIME.

Follow the federal rules. Why make this

39 hard?

Simply follow the Federal EPA rules.  
Question, if satellite accumulation areas are so risky they warrant extra, more stringent, protections, how come Federal EPA just relaxed waste accumulation for college laboratories? Shouldn't they have more strict rules to protect college students? Since the new less stringent college rules went into effect, has there been a lot of first responder injuries?

40

I have no real problem with the current waste stream-specific, one-year limitation on SA. However, Missouri needs to be sure EPA will support this application.

41

In some instances larger companies have their own regulations in that are more stringent than federal or state regulations.

42