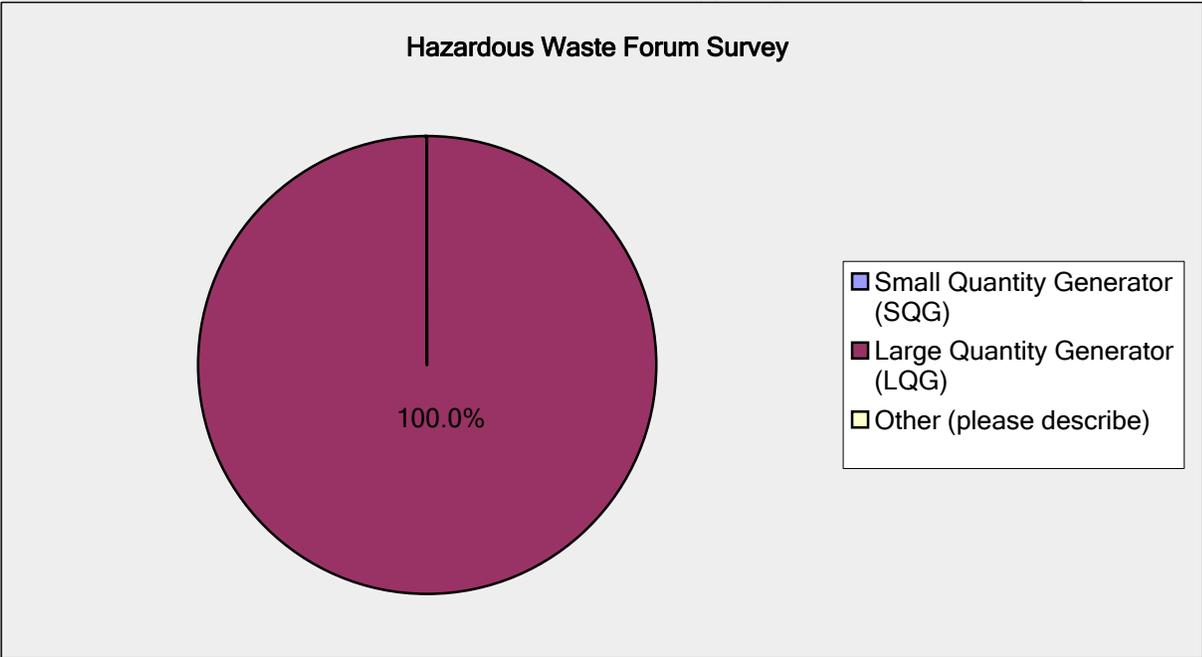


### Hazardous Waste Forum Survey - Large Quantity Generator Responses

Which category of hazardous waste generator are you?		
Answer Options	Response Percent	Response Count
Small Quantity Generator (SQG)	0.0%	0
Large Quantity Generator (LQG)	100.0%	49
Other (please describe)	0.0%	0
<i>answered question</i>		<b>49</b>
<i>skipped question</i>		<b>0</b>



**Hazardous Waste Forum Survey - Large Quantity Generator Responses**

Have you attended Hazardous Waste Forum meetings in the past?		
Answer Options	Response Percent	Response Count
Yes	34.7%	17
No	65.3%	32
If no, why and what would help you consider attending these meetings?		20
<i>answered question</i>		<b>49</b>
<i>skipped question</i>		<b>0</b>



Number	If no, why and what would help you consider attending these meetings?
1	Approval from General Manager to travel. Meetings are a few hours away from where my facility is.
2	I was not aware of them. if emailed about them would consider going.
3	josh.taylor@labarge.com this is the first time I have received any thing about the forums
4	Need to be in St. Louis or closer to Cape Girardeau, Mo.
5	Busy schedule. An Advance list of meeting times and places would help.
6	Not aware of meetings
7	More notice would help but also the location is an issue as we are located in Kansas City.

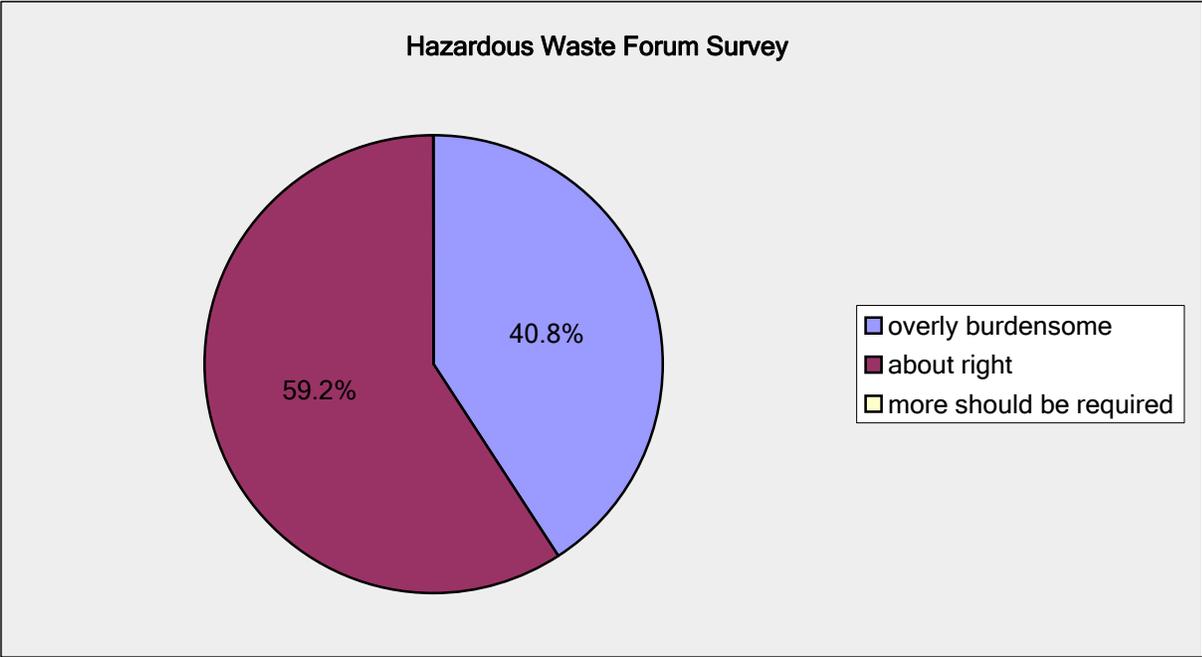
**Hazardous Waste Forum Survey - Large Quantity Generator Responses**

- not aware of such meetings - value for time  
8 spent would be analyzed  
9 Unaware of them  
As a generator, I will consider attending in  
10 the future.  
11 Closer to this end of State  
12 travel and expense time  
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  
13 Forum.  
14 Had no information about the meetings  
15 Closer location to Kansas City  
Never in a position to do so or that would be  
16 benefited to until now.  
17 Advance notice  
I was not aware of the meetings. I will  
18 attempt to attend in the future.  
It's hard to get away to go to Jefferson City.  
It's a 4+ hour drive for me and almost  
19 always involves an overnight.  
20 Notification of event for planning purposes

### Hazardous Waste Forum Survey - Large Quantity Generator Responses

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	40.8%	20
about right	59.2%	29
more should be required	0.0%	0
<i>answered question</i>		<b>49</b>
<i>skipped question</i>		<b>0</b>



## Hazardous Waste Forum Survey - Large Quantity Generator Responses

If overly burdensome, how do you suggest that safety information could be visually conveyed in a simple and reliable manner?	
Answer Options	Response Count
	19
<i>answered question</i>	<b>19</b>
<i>skipped question</i>	<b>30</b>

Number	Response Text
1	<p>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. satellite 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.</p>
2	<p>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.</p>
3	<p>simplify the regs. reduce the amount of references and exception. make them understandable to shipping people, not just compliance experts.</p>
4	

**Hazardous Waste Forum Survey - Large Quantity Generator Responses**

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 requirements.

Packaging is cumbersome. As a LQG, frequently it would be helpful if the 55 gallon limit could be increased by allowing 2-3 drums to be used sequentially.

7 N/A

Limit the requirement to containers that are 5-gallons or larger in size or follow the federal requirement.

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 labels are the manifest number.

10 N/A

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 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 relabel / 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 waste containers lifespan.

13 Federal Regs.

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

**Hazardous Waste Forum Survey - Large Quantity Generator Responses**

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

"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  
**16** useful information 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  
**17** involving containerized waste in storage.

As is already required under EPCRA, federal RCRA contingency plan and first responder site familiarization requirements, local fire codes, LEPC involvement, Part B  
**18** permit conditions, etc.  
Use NFPA or HMIS system for intermediate  
**19** storage.

## Hazardous Waste Forum Survey - Large Quantity Generator Responses

### Hazardous Waste Forum Survey

If about right, can you suggest any improvements or simplifications?	
Answer Options	Response Count
	14
<i>answered question</i>	<b>14</b>
<i>skipped question</i>	<b>35</b>

Number	Response Text
	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 label that
1	specifically states it is shipping
2	No
3	No, we are accustomed to the current requirements.
4	I don't think the EPA HW label is necessary until ready to ship but everything else should be there.
5	It is just as easy to properly label the containers with both RCRA and DOT labels and markings than to do it at separate times.
6	None. All has to be done before transport.
7	Allow the optional use of NFPA or HMIS labels in lieu of DOT hazard labels for container storage.
8	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 accidental violations are avoided.
9	na
10	None at this time
11	No
12	None come to mind. We have trained our folks on both the RCRA and DOT requirements and it works fairly well.
13	No.
14	Clearer definitions of what needs to be on the labels

### Hazardous Waste Forum Survey - Large Quantity Generator Responses

If more should be required, what and why?	
Answer Options	Response Count
	2
<i>answered question</i>	2
<i>skipped question</i>	47

Number	Response Text
1	N/A
2	N/A

## Hazardous Waste Forum Survey - Large Quantity Generator Responses

Any other options or comments regarding packaging, marking or labeling?	
Answer Options	Response Count
	10
<i>answered question</i>	<b>10</b>
<i>skipped question</i>	<b>39</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	make regulations understandable to shipping people.
3	Could require the DOT sticker to communicate the hazard rather than the whole DOT description.
4	Clarification. 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.
5	No
6	Allow for reasonable processing time for incoming materials (i.e., hazwastes), e.g., 72 hours, before enforcement of labeling rules.
7	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 approach to the facility.

**Hazardous Waste Forum Survey - Large Quantity Generator Responses**

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 than an EPA  
8 inspector will.

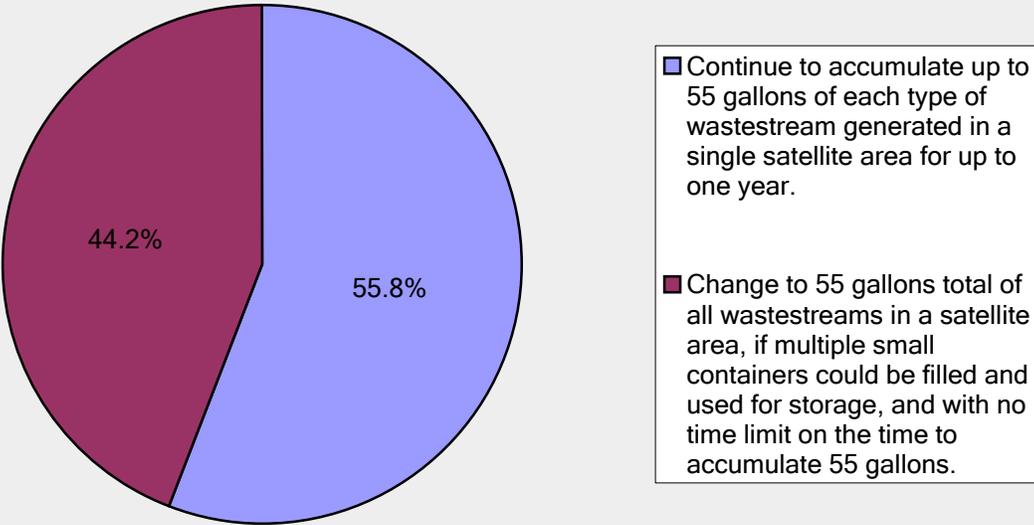
The small DOT label on a drum can not be  
9 seen in a fire in a shelter.

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  
10 when truly justified and appropriate.

### Hazardous Waste Forum Survey - Large Quantity Generator Responses

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?

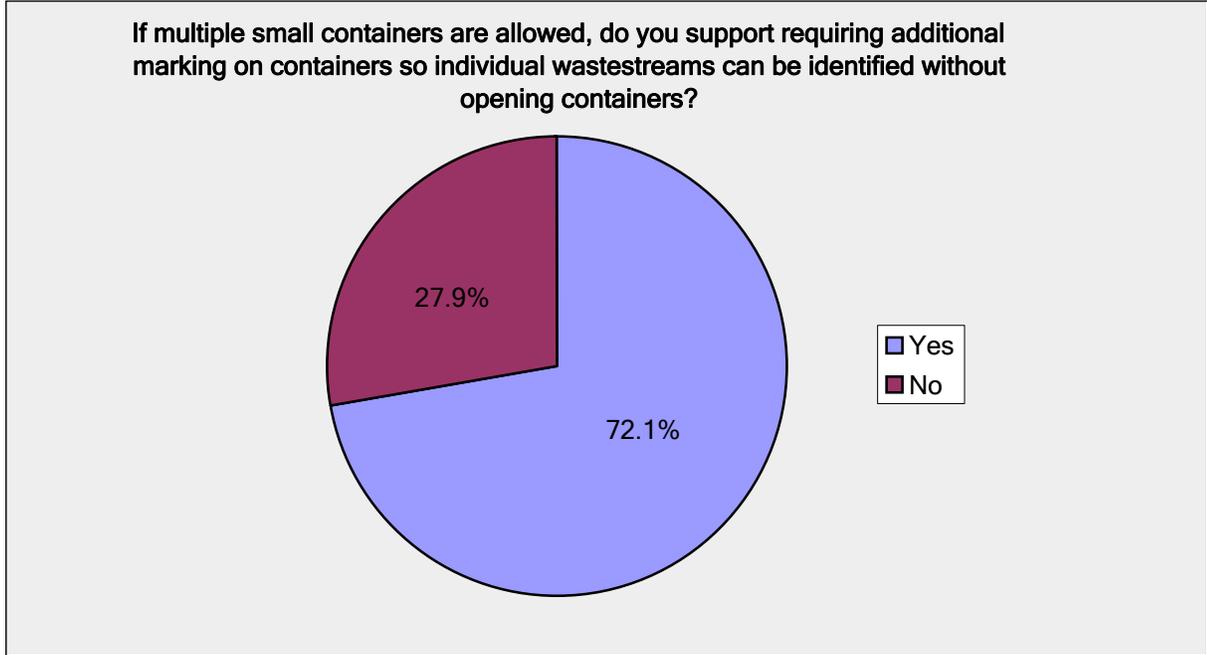
Answer Options	Response Percent	Response Count
Continue to accumulate up to 55 gallons of each type of	55.8%	24
Change to 55 gallons total of all wastestreams in a	44.2%	19
<i>answered question</i>		<b>43</b>
<i>skipped question</i>		<b>6</b>



### Hazardous Waste Forum Survey - Large Quantity Generator Responses

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

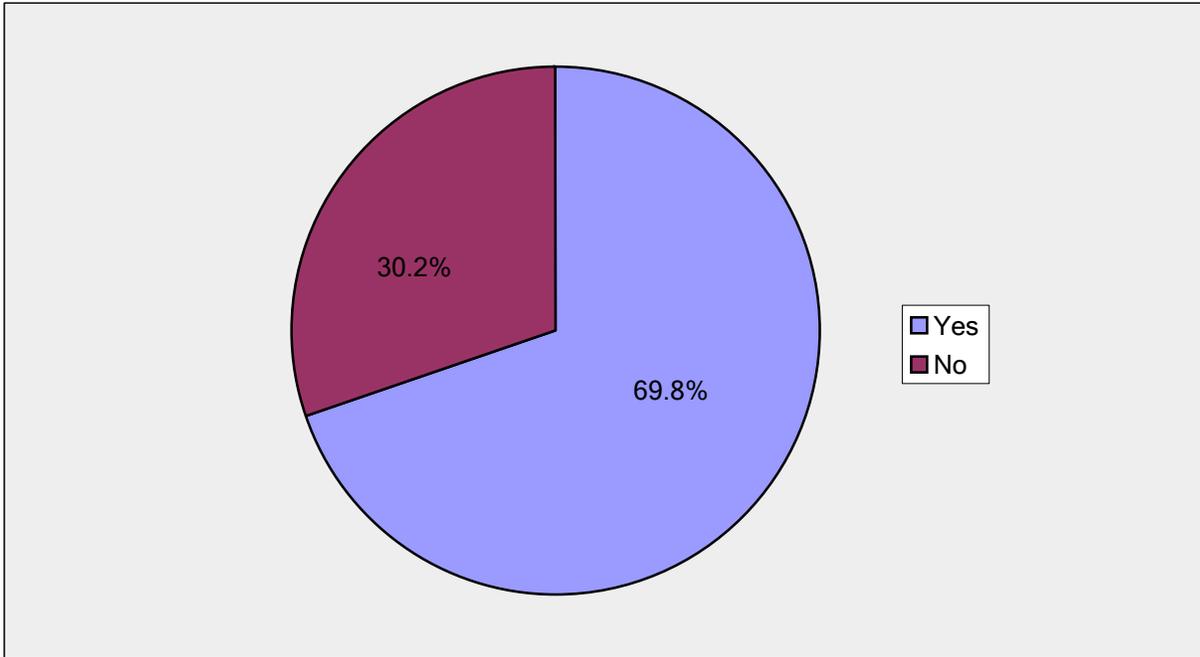
Answer Options	Response Percent	Response Count
Yes	72.1%	31
No	27.9%	12
<i>answered question</i>		<b>43</b>
<i>skipped question</i>		<b>6</b>



### Hazardous Waste Forum Survey - Large Quantity Generator Responses

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	69.8%	30
No	30.2%	13
<i>answered question</i>		43
<i>skipped question</i>		6



**Hazardous Waste Forum Survey - Large Quantity Generator Responses**

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
	20
<i>answered question</i>	20
<i>skipped question</i>	29

Number	Response Text
1	The hazardous waste labels are adequate in my opinion, with signs identifying the satellite accumulation areas.
2	Each be ID'ed
3	If individual containers are too small for a label, place them in a labeled secondary container.
4	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..
5	We already identify the type of waste stream on our hazardous waste labels.
6	Have a profile reference number on the container that refers to the waste profile document that lists all wastes allowed.
7	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 55 gal max.
8	A running total should be kept

## Hazardous Waste Forum Survey - Large Quantity Generator Responses

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 class of chemicals.

"Satellite Container" and contents marked on the top and side of the the container.  
no

Keep it the same as drums. Keep it simple. Yes...DOT & RCRA regulations must be follow.

Apply same existing rule to small containers.

No date container started, list of material(s) therein;

Straight Federal Rules.

Follow the federal rules. Why make this hard?

Information on containers should be similar to hazcom information

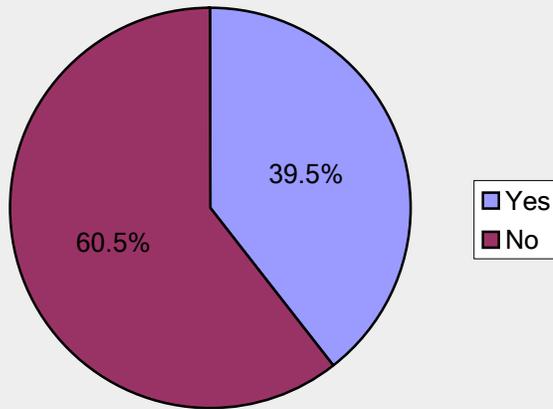
Why are we looking for something to invent here? Not a Federal EPA requirement, not found in other States that I am aware of, why does Missouri need to be different. Question, in the past 20 years, how many first responders where injured by satellite accumulation areas?

### Hazardous Waste Forum Survey - Large Quantity Generator Responses

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	39.5%	17
No	60.5%	26
<i>answered question</i>		<b>43</b>
<i>skipped question</i>		<b>6</b>

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?



## Hazardous Waste Forum Survey - Large Quantity Generator Responses

### Hazardous Waste Forum Survey

Any other options or comments regarding satellite accumulation regulations?	
Answer Options	Response Count
	15
<i>answered question</i>	<b>15</b>
<i>skipped question</i>	<b>34</b>

Number	Response Text
1	This is a very good idea.
2	Come on guys, lets keep this simple!
3	Leave the system as is and avoid making things more complicated and confusing. simplify - don't change them and make them more complicated. change them to make them more simple -- read one
4	document and be able to understand.
5	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 3 waste streams?
6	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.

## Hazardous Waste Forum Survey - Large Quantity Generator Responses

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

7 clearly defined solution murky at best.

8 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

9 would negatively impact us.

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

10 pointless.

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

11 fair pulse of the regulated community.

**Hazardous Waste Forum Survey - Large Quantity Generator Responses**

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

**12** joke?

Follow the federal rules. Why make this

**13** 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

**14** responder injuries?

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

**15** EPA will support this application.