

Missouri Hazardous Waste Program Regulatory Update

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“No Stricter Than” Rule

- Revised Missouri rules for hazardous waste generators and Treatment, Storage and Disposal Facilities to bring them more into line with federal regulations
- Provides new flexible options in certain areas
 - Container Labeling
 - Satellite Accumulation
 - Electronic Annual Reporting

Container Labeling

- Requirements for all containers in storage
 - Containers must be marked with the words “Hazardous Waste”
 - Containers must be marked with the beginning date of accumulation
- Optional Requirements (must choose one)
 - Option A – DOT Labeling
 - Option B – Alternative Labeling
 - Clearly label container with words that correctly identify the hazards of the contents of the container during the entire on-site storage period (Ignitable, Toxic, Corrosive or Reactive)
 - The label shall be white with black lettering or black with white lettering that is a minimum of one (1) inch in height

Note: For either option If the container is less than one gallon, the generator may label the locker, rack or other device used to hold or accumulate the container

Satellite Accumulation Limits

- Option One (default): Federal Interpretation
 - Limited to 55 gallons total of hazardous waste accumulation from all waste streams
 - Allows for multiple containers per waste stream
- Option Two: Missouri Interpretation
 - Submit updated Notification of Regulated Waste Activity (NORWA) form and re-notify if decision changes
 - Limited to 55 gallons per waste stream (one container per waste stream)
 - Accumulation time limit of one year or until container is full (whichever occurs first)
 - Date of accumulation on each satellite container

Electronic Annual Reporting

- A web based reporting system is now available
- Large Quantity Generators (LQGs) utilizing this system can choose to report annually instead of quarterly
- All generators may use the system, but must be registered to use the system before it can be accessed
- You can find more info at:
<http://dnr.mo.gov/env/hwp/downloads/hwfacgen-reports.htm>

“No Stricter Than” Rule

- Requires Hazardous Waste Tanks to be labeled in accordance with National Fire Protection Association (NFPA) 704 standard
- Maintained some previous options from Missouri rules
 - Storage of ignitable/reactive waste within 50 feet of property line
 - Rail Car Exemption
- Removed previously adopted Zinc Fertilizer exclusion

“No Stricter Than” Rule (cont.)

- Updated Missouri adoption of the code of federal regulations from July 1, 2010, to July 1, 2013
- Additionally, we included two additional federal rules promulgated after 2013
 - solvent contaminated wipes
 - e-manifest
- “No Stricter Than” Rulemaking Webpage
<http://dnr.mo.gov/env/hwp/enf/ruleupdate.htm>

Fee Rule

- Established a tiered registration fee for hazardous waste generators (previously \$100 for all generators)
 - \$500 for LQGs
 - \$150 for SQGs and CESQGs
- Tonnage Fee increased from \$5.00 to \$6.10 per ton
 - Minimum fee changed from \$150 to \$200 for first ton
 - Maximum increased from \$52,000 to \$57,000
- Land Disposal Fee increased from \$25.00 to \$29.50 per ton

Future Rulemaking Efforts

- Underground Storage Tank (UST) Operational Rules
- Missouri Risk-Based Corrective Action (MRBCA) Guidance Revisions
- Update to incorporate the most recent federal updates and other rule cleanup actions

For More Information

UST Operational Rule Changes Web page

<http://dnr.mo.gov/env/hwp/ustchanges.htm>

MRBCA Workgroup Web page

<http://dnr.mo.gov/env/hwp/mrbcaupdate.htm>

Hazardous Waste Rules in Development
Web page

<http://dnr.mo.gov/env/hwp/rules-dev-hwp.htm>

Slide 10

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What is with the program email address here?

DNR, 11/30/2015