



MISSOURI
DEPARTMENT OF
NATURAL RESOURCES

Resource Recovery Rescinded!

Is this the end of civilization as we
know it?

Resource Recovery Rescinded

- On March 30, 2019, the Resource Recovery regulations will be rescinded.
- On March 30, 2019, the MDNR will recognize Hazardous Secondary Materials as part of the new Definition of Solid Waste

How will this impact Resource Recovery Facilities?

- If you have a Resource Recovery Certificate you may continue to operate as usual until the certificate expires.
- If you recycle large volumes of hazardous waste you may wish to notify MDNR as a reclamation facility before the certificate expires.

How will this impact Resource Recovery Facilities?

- RR facilities must notify MDNR when their certificate expires if they wish to take advantage of the solid waste exclusion for hazardous secondary materials.

How will this impact ESQGs?

- Since they are already exempt from most hazardous waste regulations it is business as usual.
- No impact.

How will this impact SQGs?

- SQGs may continue to recycle hazardous waste as they always have.
- If you are in compliance with hazardous waste regulations now you may continue to handle the recycled materials as before.
- If you wish to take advantage of the solid waste exclusion of hazardous secondary materials you must notify MDNR.

How will this impact SQGs cont.

- MDNR anticipates that many SQGs will not notify MDNR and take advantage of the solid waste exclusion of hazardous secondary materials.
- A few SQGs may notify to take advantage of the exclusion and become ESQGs. However, they must still meet HSM requirements.

How will this impact LQGs?

- LQGs may continue to recycle hazardous waste as they always have.
- If you are in compliance with hazardous waste regulations now you may continue to handle the recycled materials as before.
- If you wish to take advantage of the solid waste exclusion of hazardous secondary materials you must notify MDNR.

How will this impact LQGs?

- MDNR anticipates that many/most LQGs will notify MDNR and take advantage of the solid waste exclusion of hazardous secondary materials.

How will this impact TSDs

- MDNR anticipates that many/most TSDs will notify MDNR and take advantage of the solid waste exclusion of hazardous secondary materials.

How will this impact MDNR?

- We anticipate a significant reduction in hazardous waste fees.
- We anticipate a total loss of RR Certificate registration fees.
- The rule change may require additional outreach to the regulated community.

Recycling Hazardous Waste vs Recycling Hazardous Secondary Materials

Recycling Hazardous Waste

- Facilities may continue to recycle (reclaim) hazardous waste as before.
- Containers and tanks must meet hazardous waste requirements for labeling, storage time frames, etc.
- Facilities no longer need to register as a Resource Recovery facility.

Recycling Hazardous Waste cont.

- Generators of hazardous waste must continue to pay fees on the waste sent offsite for reclamation.

Recycling Hazardous Secondary Materials (HSM)

- Facilities must notify MDNR to qualify for the HSM exclusion.
- Slightly less stringent regulatory burden.
- No hazardous waste fees.

HSM Requirements

Two common types of exclusions

1. Under the control of the generator.
2. Transferred to another facility.

Remanufacturing is a much less common exclusion and will not be discussed today.



Reclamation must be legitimate

1. HSM must provide a useful contribution to the process of product.
2. Process must produce a valuable product or intermediate.
3. Must be managed as a valuable commodity.

Reclamation must be legitimate

4. Generator must consider if the product:
 - Contains higher concentrations of hazardous material.
 - Contains hazardous constituents not found in similar products.
 - Exhibits a hazardous characteristic not found in similar products.

Under the Control of the Generator

- Generated and reclaimed at the same site.
- Reclaimed at another facility controlled by the same generator.
- Reclaimed under a tolling agreement with a contractor.

Requirements

- HSM is managed in containers and tanks in good condition.
- Material is not speculatively accumulated.
- Maintain documentation of legitimacy.
- Preparedness and response requirements similar to SQG requirements for facilities that accumulate less than 6000kg.

Requirements

- Preparedness and response requirements similar to LQG requirements for facilities that accumulate more than 6000kg of HSM.

Requirements for material shipped offsite

- Material is not speculatively accumulated.
- The reclamation is legitimate.
- Material is managed in containers and tanks in good condition.
- Sent to a TSD or reclamation facility.

In Conclusion

- Facilities can continue to operate as they do now.
- The HSM exclusion is voluntary.
- This will not effect small hazardous waste generators.
- Civilization is not ending (because of this change).



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