



# Missouri Satellite Accumulation Rule Update

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# 2015 Missouri Rule

## Two satellite area options:

- ▶ Volume-limited approach (federal guidance)
  - ▶ Maximum 55 gallons non-acute or 1 quart acute total accumulation of all wastestreams allowed in a satellite area
- ▶ Time-limited approach (longstanding Missouri rule)
  - ▶ Maximum 55 gallons of non-acute or 1 quart acute accumulation of each wastestream allowed
  - ▶ One year time limit on accumulation in a container. Satellite containers must have accumulation start date label

# 2015 Missouri Rule

Availability of two satellite area options came with additional requirements

- ▶ Generators electing to continue using Missouri time-limited option must notify DNR on modified Notification of Regulated Waste Activity form
- ▶ Generators must choose either volume-limited or time-limited option and apply it to entire generator site
  - ▶ No allowance for differences in waste-generating processes within a facility

# 2018 Red Tape Reduction Proposal

July 16, 2018 proposal would have eliminated the Missouri option that allows multiple wastestreams up to 55 gal/1 quart each, but sets 1 year time limit on each container

- ▶ The proposal would have left only the federal option that EPA interprets to mean 55 gallon non-acute or 1 quart acute total allowed accumulation of all wastestreams in a satellite area

# Red tape reduction should not reduce compliance options

The time-limited and volume-limited approaches both serve the purpose of ensuring that wastes don't pile up at the point of generation, but keep moving to a central storage area or shipment off-site

# Red tape reduction should not reduce compliance options

- ▶ Federal total volume limits work best for processes that generate only one wastestream in a satellite area
  - ▶ **Example: 5 gallon step cans on shop floor**
    - ▶ Impossible to exceed 55 gallon total non-acute limit per satellite area
  - ▶ Under Missouri time-limited approach:
    - ▶ Step cans are emptied frequently. The accumulation start date label serves no environmental purpose—busywork



# Red tape reduction should not reduce compliance options

- ▶ Missouri one year time limit works best for processes that generate multiple wastestreams in a satellite area
  - ▶ **Example: 55 gallon waste drums in paint booth mix room**
    - ▶ Multiple non-acute wastestreams: spent solvent from spray gun cleaning, waste paint, solid paint & solvent contaminated wipes
  - ▶ Under federal approach:
    - ▶ Hard to determine when 55 gallons total is reached, without opening containers and estimating
    - ▶ Total of 55 gallons is reached fairly quickly. Partially full drums would have to be moved frequently to central storage area



# DNR Draft Final Rule Presented to Hazardous Waste Commission

Would retain both compliance options: federal total volume-limited and Missouri time-limited

- ▶ Would eliminate requirement to notify DNR in advance which option will be used
- ▶ Would allow generators to use either option within a facility (generator I.D. #), i.e. match compliance approach to generating process at that satellite area
  - ▶ Must use consistent method within a satellite area



# Hazardous Waste Commission Adoption—November 13

Retains both compliance options: federal total volume-limited and Missouri time-limited

- ▶ Eliminates requirement to submit written notification to DNR regarding which option will be used
- ▶ Allows generators to use either option within a facility (I.D. #), i.e. match compliance approach to generating process at that satellite area
  - ▶ Must use consistent method within a satellite area

# Timeline for Revised Rule

- ▶ Approved by Commission Nov. 13, 2018
- ▶ Multiple steps, including submittal to Secretary of State, Missouri Register publication, and incorporation into Code of State Regulations
- ▶ Effective date of revised rule typically about 4 months after Commission vote—around March 2019?
  - ▶ Until then, 2015 rule is in effect. Two options available, but not within the same facility. Users of time-limited option should have notified DNR.