

Waste Management Program

Director's Update
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MoDNR

Authority

MoDNR is the agency with statutory authority for administration of the hazardous waste program in Missouri. Authority is granted under the Missouri Hazardous Waste Management Law, Missouri Revised Statutes, Sections 260.350 through 260.433 et seq., and regulations. Missouri Code of State Regulations, Title 10 - Department of Natural Resources, Division 25 - Hazardous Waste Management Commission.

MoDNR has approved state status for implementing Federal Subtitle D, Solid Waste Disposal Areas. Missouri Code of State Regulations, Title 10 - Department of Natural Resources, Division 80 - Solid Waste Management.



A summary of the past hazardous waste authorization activity for Missouri is as follows:

1984 base program authorization application (effective December 4, 1985)

Program revision (submitted February 1989, effective April 28, 1989)

Program revision (submitted January 1993, effective March 1993)

Program revision (submitted May 1997, effective July 1997)

Corrective Action authorization (effective July 6, 1999)

Program revision (submitted February 2000, effective April 28, 2000)

Program revision (submitted October 1, 2001, effective November 30, 2001)

Program revision (submitted April 28, 2006, effective June 27, 2006)

Program revision (submitted October 26, 2012, effective December 26, 2012)



Authorization



2023 Updates needed

- 2002 Consolidated Checklist - Updated through December 31, 2002 CFR
 - o Wood Preserving Listings

• 2018 Consolidated Checklists - Updated through June 30, 2018 CFR

C 1 - 40 CFR Part 260

C 4 - 40 CFR Part 263

C 5 - 40 CFR Part 264

C 6 - 40 CFR Part 265

C 7 - 40 CFR Part 266

C 9 - 40 CFR Part 268

C 10 - 40 CFR Parts 270

C 11 - 40 CFR Part 273

C 12 - 40 CFR Part 279

- **2018 Consolidated Checklists - Updated through June 30, 2018 CFR as Amended by the August 6, 2018 Final Rule (83 Fr 38262)**

 - C 2 - 40 CFR Part 261

 - C 3 - 40 CFR Part 262

- **2020 Consolidated Checklist - Updated through January 16, 2020 CFR**

 - C 241

- **2023 Consolidated Checklist - Updated through August 9, 2023 CFR and December 6, 2023**

 - Partial Withdrawal

 - C 2416

2025 Hazardous Waste Rule Update

- Adopted and implemented stakeholder requested Federal hazardous waste regulations.
- Rules adopted include
 - Federal Generator Improvement Rule
 - Federal Pharmaceutical Rule
 - Aerosol Cans as Universal Waste Rule
 - Safe Management of Recalled Airbag rule
 - Federal E-manifest Rule
 - Wood Treaters Rule(s)

Generator Improvement Rule (10 CSR 25-3,4,5,6,7,9,11, and 16)

- Episodic events (allows generators to generate waste outside their normal waste generation amount without needing to be the higher generator category)
 - 29 planned events since March 1, 2025
 - 8 unplanned events since March 1, 2025.
- Very Small Quantity Generator waste consolidation (allows VSQG facilities to consolidate waste to LQG facilities owned by the same operator)
 - Only 1 facility has opted in within MO thus far.
- Contingency Plan and Quick Reference Guide (new regulations require LQG facilities maintain QRGs as part of/in addition to Contingency Plans)
 - Requirements are inspected against, compliance assistance has been provided.
 - No referrals to enforcement solely for violations of Contingency plan or QRG requirements.



Pharmaceutical Rule (10 CSR 25-4, 5, and 7)

- Management Standards for Hazardous Waste Pharmaceuticals and Amendment to the P075 Listing for Nicotine (Pharms rule)
 - Mandatory participation for facilities which are/were SQG or LQG when totaling all hazardous waste generated (pharm or not) on site.
 - 701 sites opted in as healthcare facilities as required by the Rule
 - 13 LQG, 225 SQG, and 463 VSQG.
 - Notifications were updated and received in compliance with the Rule with minimal Department intervention required.
 - No NOVs issued for failure to notify.
 - Compliance assistance given to those who should have been registered under Pharms but failed to do so. (Basically, "hey, you need to notify as opting into Subpart P").

Aerosol Cans as Universal Waste Rule (10 CSR 25-16)

- Allows management of aerosol cans as universal waste as opposed to having determine if/what hazardous waste regulations are applicable.
- Low reported utilization rate. Meaning, we don't see a ton of facilities utilizing the option to manage them as UW.

Safe Management of Recalled Airbag rule (10 CSR 25-4, 5, and 7)

- Affected a small percentage of total regulated facilities in MO.
- Seems to be well-received among those that would utilize it.

E-manifest Rule (10 CSR 25-5, and 7)

- E-manifest (Creates the framework for allowing generators, transporters, and TSDFs to utilize electronic manifests)
 - First and second rule adopted by reference in overall rule update.
 - Third rule not adopted by MO but has elements mandatory for all generators nationwide.
 - Requires manifest discrepancy, exceptions, and unmanifested waste reports to be submitted through federal E-manifest system, which can only be accessed with an EPA ID.
 - EPA can elect to enforce compliance with those requirements. Noncompliance easily discovered.

Sunset Paper Manifest Rule

- EPA published the Paper sunset proposed rule in the FR March 5, 2026
- [Federal Register : Paper Manifest Sunset Rule; Modification of the Hazardous Waste Manifest Regulations](#)
- Accepting comments through May 4, 2026
- EPA is proposing to sunset the use of paper manifests 24 months after the publication of EPA's final rule.

General Correlation between State Regulations and Federal Regulations

EPA REGULATION Code of Federal Regulations (CFR)	STATE REGULATION	DESCRIPTION
PART 260	10 CSR 25-3.260	Hazardous Waste Management System: General
PART 261	10 CSR 25-4.261	Methods for Identifying Hazardous Waste
PART 262	10 CSR 25-5.262	Standards Applicable to Generators of Hazardous Waste
PART 263	10 CSR 25-6.263	Standards for Transporters of Hazardous Waste
PART 264	10 CSR 25-7.264	Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities
PART 265	10 CSR 25-7.265	Interim Status Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities
PART 266	10 CSR 25-7.266	Standards for the Management of Specific Hazardous Wastes and Specific Types of Hazardous Waste Management Facilities
PART 268	10 CSR 25-7.268	Land Disposal Restrictions
PARTS 270	10 CSR 25-7.270	The Hazardous Waste Permit Program
PART 273	10 CSR 25-16.273	Standards for Universal Waste Management
PART 279	10 CSR 25-11.279	Standards for the Management of Used Oil

MoRCRA

Launched on March 11, 2026

MoRCRA allows for the electronic submittal of the Notification of Regulated Waste Activity and allows generators to opt to receive correspondence electronically rather than through the mail. It also takes data from EPA's E-manifest system and allows us to eliminate the state reporting requirements for most generators. Generators are also now able to submit their registration forms electronically.

Additional information in a later presentation by David Green.



Waste Management Program 2025 Pesticide Collections

- Four collection events (two in the Spring and two in the Fall)
- 134 participants
- 49,851 pounds of pesticides collected

- Over 1 million pounds of pesticides have been collected to date

- 4 collection events scheduled for 2026
- MFA Agri Services in Montgomery City on Saturday, May 23rd
- 3 in the fall



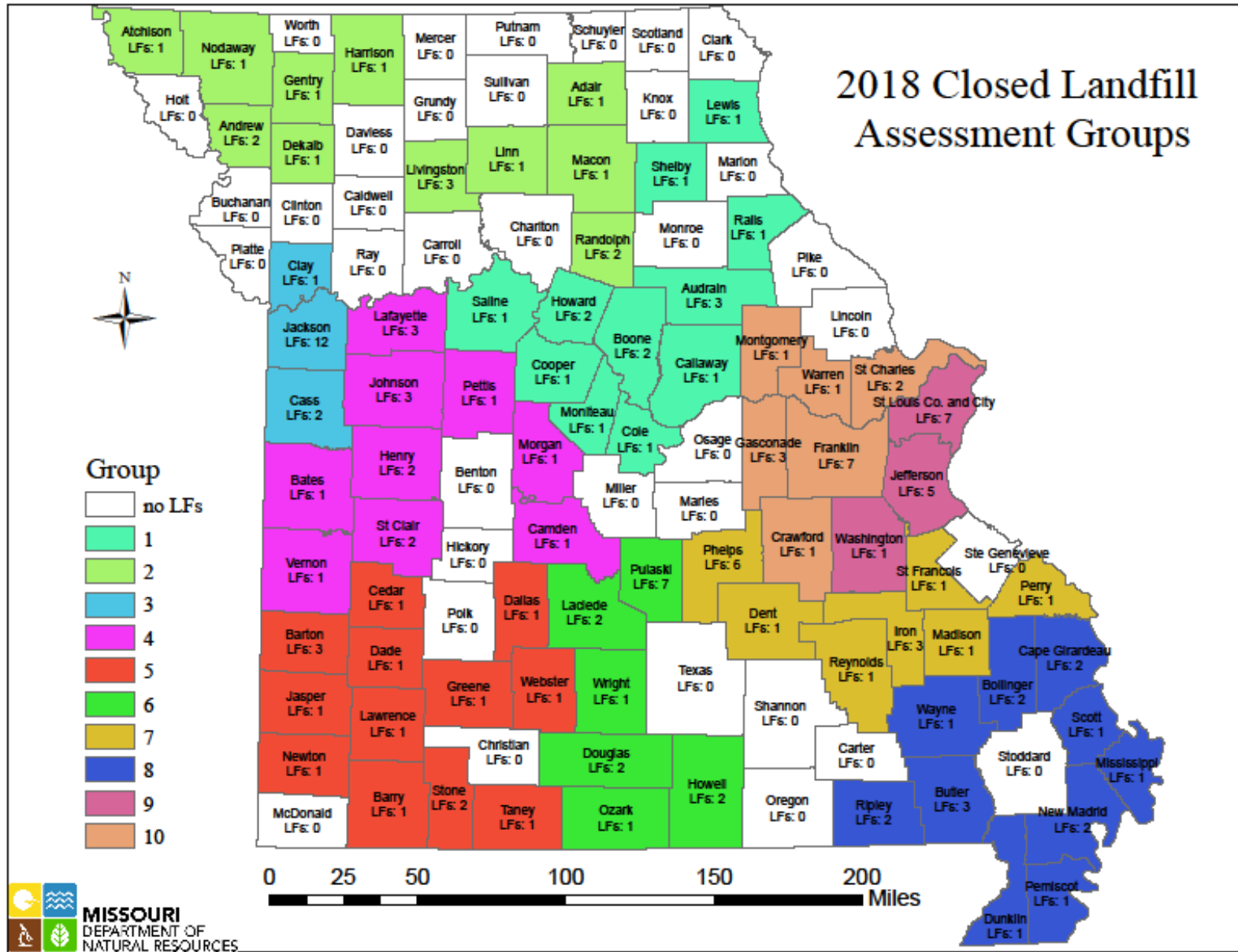
Backlog Elimination

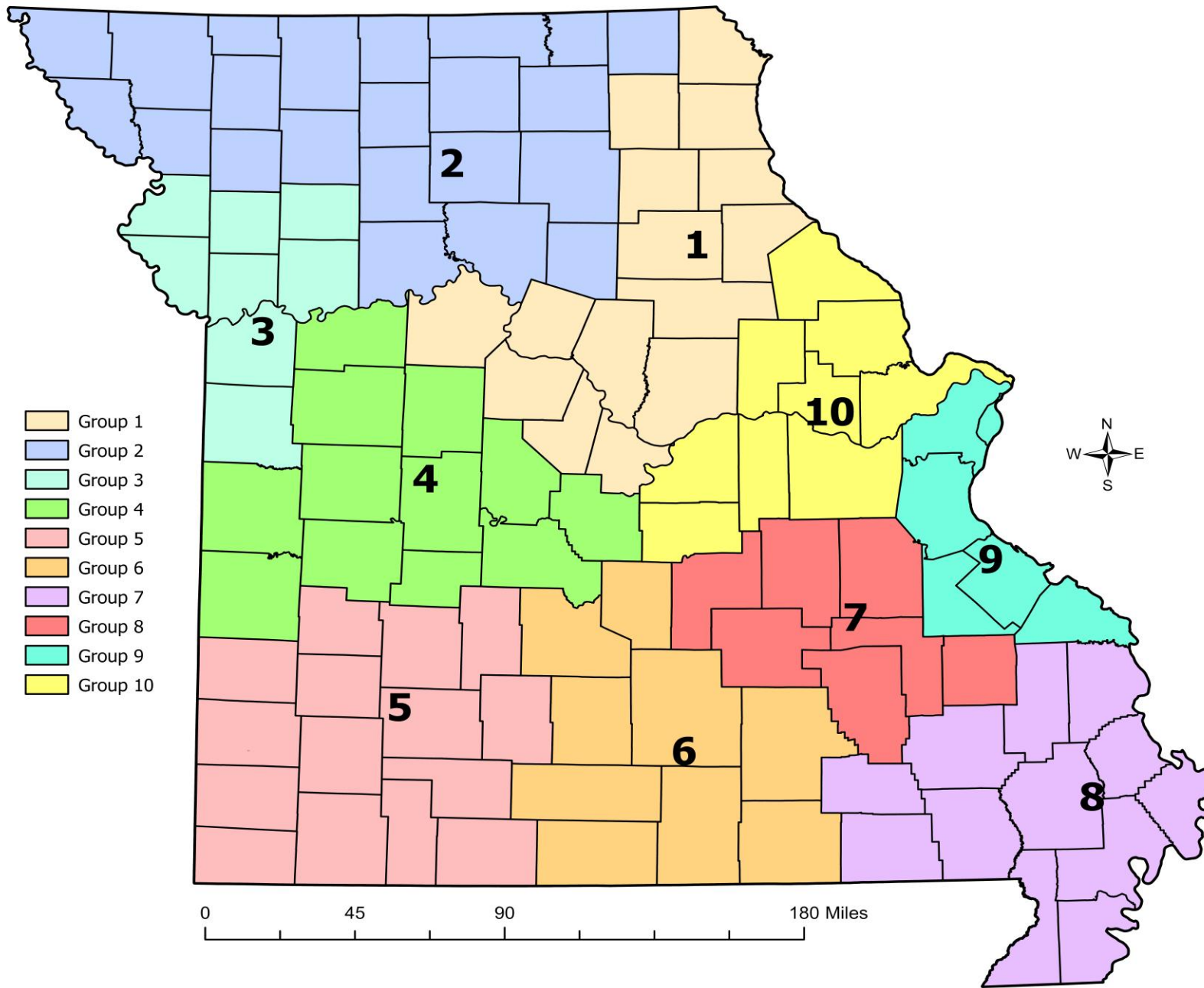
- In 2018
- 19 permits were “administratively continued” or backlogged.
- In 2025,
 - BASF removed from backlog after 3401 Days
 - Bannister Federal Complex was issued a permit
 - Doe Run Buick is on track to be issued late May 2026
 - End of public comment period is May 11, 2026.
- This will eliminate the permit backlog!

Solid Waste

- Subtitle D
- Missouri was approved to implement in 1993
- Before Subtitle D - 79 active sanitary Landfills
- After about 33
- Reaching end of the 20/30 year post closure period
- Closed landfill assessment started in 2018

2018 Closed Landfill Assessment Groups





The Goal

- Assess the landfills in 10 Groups
- Compile assessment data to gauge general health and condition
- Prioritize landfills of greatest need
- Solicit bids via State contract to estimate corrective action costs (Phase 2)
- Solicit bids via State contract to implement corrective actions (Phase 3)

Landfill Assessments

Group 9 (of 10) Landfill Assessments were completed 2025

- Group 9 included 12 closed/inactive landfills in the St. Louis area

Group 10 (of 10) Landfill Assessments underway

- Group 10 includes 28 closed/inactive landfills
- Group 10 will be completed inhouse (previous assessments were conducted by a contractor)
- Do not have funds for phase 2 or 3
- Have identified a group of landfills without a PRP

Coal Combustion Residuals

- In 2015 EPA's Coal Combustion Residuals (CCR) Rule, or Coal Ash Rule, established the first national minimum criteria for managing coal ash in landfills and surface impoundments under RCRA Subtitle D. It regulates structural integrity, groundwater monitoring, and closure requirements to prevent contamination, requiring closing unsafe, unlined ponds.
- In 2024, EPA finalized the "Legacy CCR Rule," expanding regulations to inactive surface impoundments at inactive facilities.
- During 2025-2026: EPA issued extensions and proposed further revisions (direct final rule, 2026) to allow more time for compliance due to site numbers, logistics, and labor, while facing challenges from environmental groups regarding potential cleanup delays.
- Ongoing litigation since 2015.

Coal Combustion Residuals

On April 9, 2026, EPA announced proposed revisions to regulations for the disposal of coal combustion residuals in landfills and surface impoundments. The proposal would provide relief for dewatering structures and legacy units, remove or narrow the scope of CCR management units, establish a new compliance pathway that allows for site-specific considerations in permitting, and revise the definition of beneficial use to promote resource recovery.

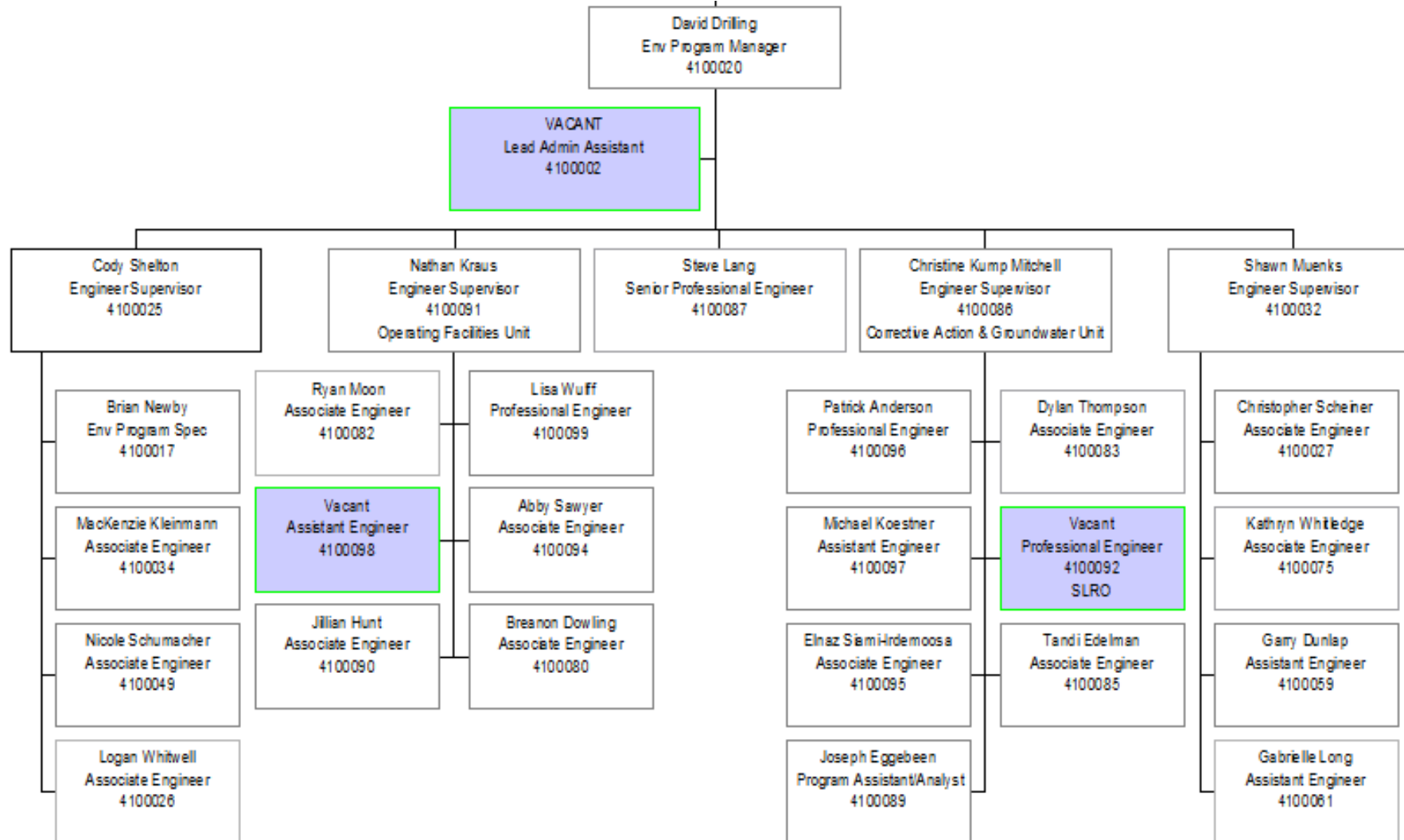
EPA will accept comments on this proposal for 60 days.

Missouri has held back on requesting authorization for a CCR program due to the changing regulatory framework. The recent proposal will provide significant changes and we are interested in hearing from our stakeholders if Missouri should formally pursue delegation.

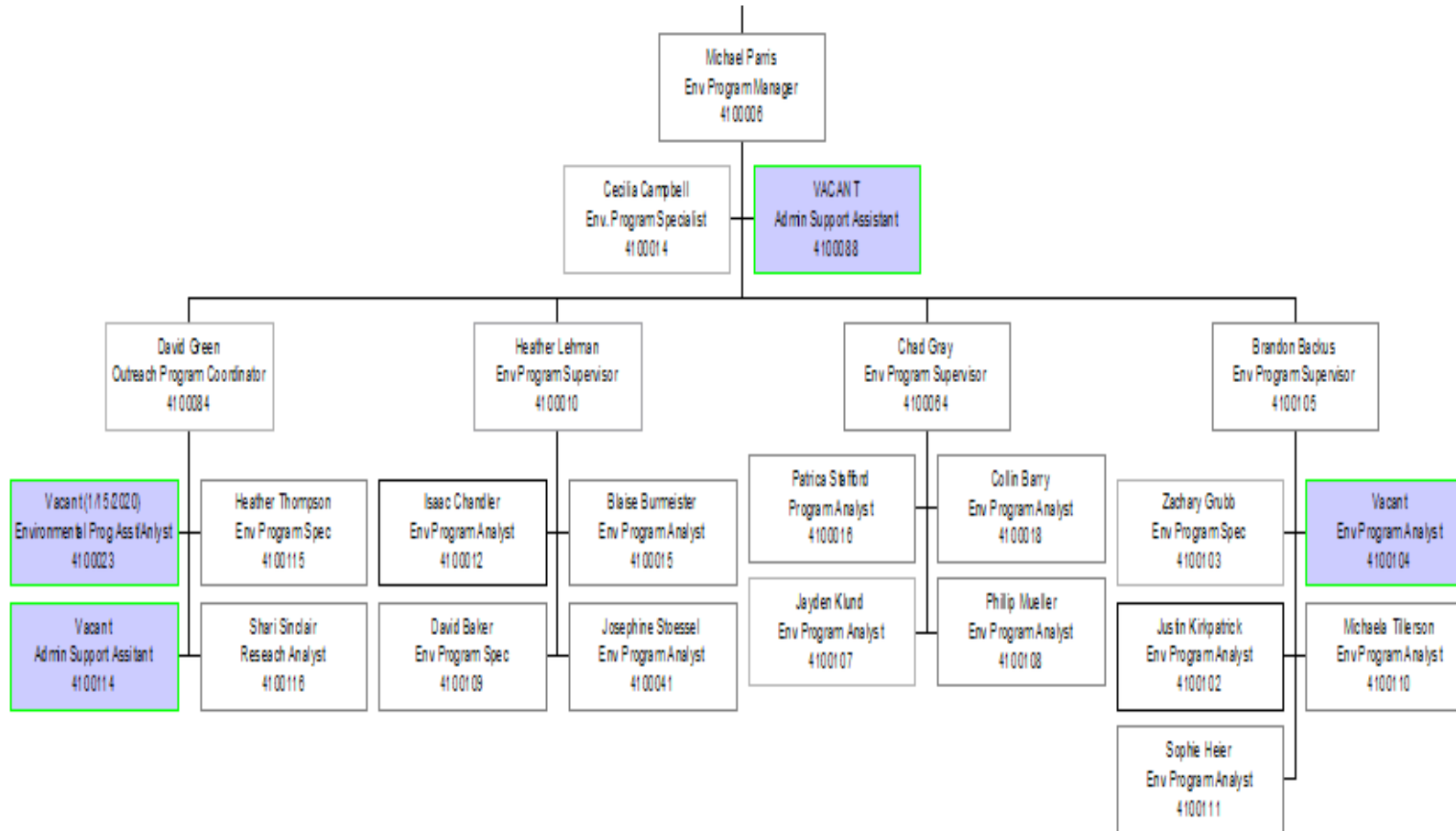
Please email WMP@dnr.mo.gov



Engineering Section



Enforcement Section



Questions?

