

## **Hazardous Waste Regulation Stakeholder Group Meeting Notes October 28, 2004**

Meeting Participants: P. Raftery, P. Harley, W. Morris, W. Howard, D. Albro, S. Carney, M. Dennen, L. Grandchamp and T. Getz

The October 14<sup>th</sup> meeting notes were reviewed. One commenter mentioned the first bullet on page three should be corrected to read 1320 gallons. The changed will be made as suggested.

The group was asked for comments on the first four sections of the proposed regulations. There were no comments made, but the group thought it would be a good idea for DEM to walk everyone through the regulations again. As a result of this review, the following comments were made:

- The definition of used oil was good.
- Connecticut has a definition of halogenated hazardous waste constituents. DEM should consider using this definition instead of the DEM proposed “significant concentrations”.
- With respect to section 15.03, DEM is not encouraging the burning of off-spec oil. DEM will, however, allow the blending of oil to meet the standard.
- Comments were raised again about fees. Concerns were raised that the generator fees are passed on to the transporters. In addition, used oil should not have a fee since it was not a hazardous waste. Adjustments should be made to the hazardous waste fee to ensure funds needed to cover the budget shortfall would be covered by this waste category. Discussion was postponed on this topic until later in the process. DEM staff will work with the inventory data and develop a few fee funding scenarios that will be compared with the current program.

Sean Carney then proceeded to discuss the changes to the regulations starting with Section 15.05. (Used Oil Aggregation Points), Section 15.06 (Used Oil Collection Centers) and finished the review with Section 15.07 (Used Oil Transporter and Temporary Storage Facility Standards. A number of comments were made during the presentation and include the following:

### Section 15.05

- Aggregation points need to be more clearly defined.

### Section 15.06

- This section of the regulation applies mostly to municipally run igloos.

### Section 15.07

- A separate permit is anticipated for entities that only transport used oil. The permit requirements are similar to those required for hazardous waste permits. It was noted that hazardous waste transporters would be able to transport used oil with their existing permit. The regulations will be amended to clarify this point.
- DEM will review the amount of time used oil can be stored on-site without requiring permits. DEM will consider increasing the time to 72 hours to cover problems associated

with weekend storage. DEM will clarify the regulation to make sure that storage does not include transferring content from smaller trucks into larger containers.

At this point the meeting was adjourned. The next meeting is scheduled for November 18<sup>th</sup> in Room 280 in 235 Promenade Street. The group will meet from 2:30 –4:00.