

HEARING BEFORE THE WYOMING ENVIRONMENTAL QUALITY COUNCIL
PROPOSED REVISIONS TO HAZARDOUS WASTE RULES AND REGULATIONS

June 24, 2008

Presentation Talking Points

Background

- Revisions to state regulations in response to changes in federal regulations
- To maintain primacy in implementation of HW program in Wyoming
- Consistency with federal program

Key Revisions

- Corrective Action Management Unit Rule
 - o CAMU
 - Disposal unit
 - Onsite management of remediation wastes from HW facilities
 - o Requirements for new CAMUs
 - Design/construction
 - Waste treatment
 - o Regulatory status of existing ('grandfathered) CAMUs
 - 3 at Wyoming HW facilities
 - o Will impact Wyoming facilities
 - New CAMUs
 - Expansions of existing CAMUs
- Post-Closure Rule
 - o Post-closure
 - Units managed HW - disposal
 - Requirements for p-c care and corrective action
 - o Alternative mechanisms to a post-closure permit
 - Orders or remedy agreements
 - o Will impact Wyoming facilities
 - Chevron/Texaco Casper refinery
 - Others, as alternative to permit renewal?
- Military Munitions Rule
 - o Ammunition products/components used by DOD for defense/security
 - o When subject to HW requirements
 - o Transportation/storage of waste munitions
 - o Limited impact to Wyoming
- Miscellaneous Provisions (limited impact to Wyoming)
 - o Restrictions on land disposal of hazardous wastes
 - o Exemptions for certain hazardous wastes
 - o Recycling of certain hazardous wastes

More Stringent Provisions

- Nine More Stringent Provisions
- Petition to Council Pursuant to W.S. §35-11-503(a)
- 'Categories'
 - o Automatic approvals/reinstatements
 - HW combustor modification
 - no HW combustors in Wyoming
 - Munitions transporter
 - HW manifest exemption
 - reinstatement
 - o automatic vs. specific action
 - Munitions storage
 - conditional exemption
 - reinstatement
 - o automatic vs. specific action
 - o Notification
 - Munitions rule
 - munitions outside range
 - records vs. notification
 - o Newly regulated surface impoundments
 - Federal statutory provision
 - HW Chapters 10 & 11
 - o 'Automatic' rule changes
 - Munitions rule
 - DOD shipping controls
 - DDESB storage standards
 - Violate state statute
 - o Munitions storage
 - Conditional exemption
 - Repository w/o permitting

Comments

- U.S. Fish and Wildlife Service
 - o Comments on existing rules, not proposed rules
 - o Requesting notification on hazardous waste surface impoundments
 - Migratory birds
 - Wildlife resources
 - o Draft permit notification requirements
 - Wyoming Game and Fish
 - US Fish and Wildlife Service
 - o Currently no permitted HW surface impoundments in Wyoming
 - None currently anticipated