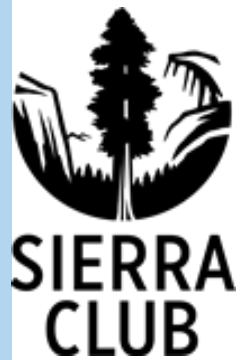


# Weaker Hazardous Waste Oversight, Reduces Transparency, Adds Red Tape Oppose SB 918 and HB 2426



## Harms Hazardous Waste Oversight Program

By putting a "no stricter than" federal standard, SB 918 would nullify provisions of the state administration for hazardous waste requirements that have been refined with stakeholder input over several decades. Federal standards were written to be a floor for state environmental protections, not a ceiling. Setting up "no stricter than federal" clauses does nothing but tie the hands of Missouri state agencies to protect our citizens and the environment.



An area in which Missouri is more protective than federal standards is our treatment of waste oil. Unregulated waste oil, mixed with pharmaceutical waste, gave Missouri hundreds of acres in over 30 dioxin sites with over one billion dollars of combined cleanup cost and perpetual deed restrictions limiting their use. These actions by the State of Missouri have protected thousands of people from bodily harm from dioxin, including cancer, reproductive and developmental problems, damage to the immune system, and hormone problems. This would harm our ability to protect ourselves from another catastrophe like the one that befell Times Beach forty years ago.

The entirety of the bill will decrease fees to the Hazardous Waste Program by at well more than \$200,000 per a year while creating a large amount of short to medium term work for the program as it adjusts and creates protocols for the changed rules. These burdens will be placed on a program that is already short staffed and is facing even greater loss of experienced staff.

## More Red Tape, Less Transparency

These sections on administrative penalties are in part unnecessary and in part counterproductive. The provision that provides violators a written calculation of the penalty is not necessary as the department provides this now. A violator can see the thought process of documenting the severity, duration and other factors the department used in calculating a proposed penalty. The provision that maintains this as confidential is not productive to either the violator, who may want to see how his/her particular penalty adds up compared to others, or to those who may want to see if the department is treating all violators fairly. While such documents may be held confidential in anticipation of litigation, once a matter is settled the documents should be readily available to anyone who wants to see them.

**SB 918 is sponsored by Senator Burlison. HB 2426 is sponsored by Representative Houx.**