

Liquid Industrial Waste Stakeholders Meeting
Constitution Hall, Lansing, Michigan
June 10, 2014

Summary Minutes

Present: See sheet at end of document

- 1) Welcome and Introductions
- 2) Purpose
 - a) The purpose of this Liquid Industrial Waste (LIW) Stakeholders (Stakeholders) group is to advise the DEQ Director regarding the LIW recommendations made by the Office of Regulatory Reinvention (ORR), and other issues related to LIW regulation. The Stakeholders are not a voting body; thus, they may send an alternate or bring additional persons with them to meetings. The DEQ will seek consensus on issues and consider all input from the Stakeholders. The DEQ Director is the final decision-maker.
- 3) Items discussed
 - a) There will be statutory changes only, as Part 121 does not have administrative rules.
 - b) Manifests
 - i) Stakeholders agreed that manifests were not needed for LIW shipments and that other required shipping documents, such as Bills of Lading, would provide the necessary information.
 - ii) Stakeholders agreed that the use of electronic shipping documents should be allowed under Part 121.
 - iii) Stakeholders agreed to continue using the existing manifests until statute changes are implemented.
 - c) Materials recommended for regulation under Part 121
 - i) Keep only basic requirements for LIW, thus no need for all the exemptions currently present in Part 121.
 - ii) Identify duplicative rules and the gaps where additional regulation is necessary. Suggestion made to have DEQ evaluate conflicts, overlap and duplication between 121 and other rules and regulations.
 - d) Site ID and the waste codes
 - i) Is notification required for LIW sites? If yes, does that include an ID number requirement? Further discussion needed.

- ii) Working concept is that generators will not notify; however, transporters and designated facilities should notify.
 - e) Should Part 121 simply be eliminated? Stakeholders agreed that there is a need for the standards in Part 121. However, the reporting/manifesting/recordkeeping should be reduced/eliminated.
- 4) Suggested basic requirements for LIW regulation:
- a) Generators:
 - i) Notification - Not to be required
 - ii) Performance standards protective of health and the environment
 - iii) Characterization
 - iv) Shipping documents
 - v) Recordkeeping
 - vi) Report releases
 - vii) Protect waste from vandals, etc.
 - b) Transporters
 - i) Notification
 - ii) Threshold issues/reporting requirements—further discussion needed.
 - iii) Licensing - Those transporters with haz waste license should be deemed to have adequate license
 - c) Designated Facilities
 - i) Notification/ID Number requirements
 - ii) Acceptance of receipt
 - iii) Protect from releases and vandals
 - iv) Storage not over one year
 - v) Recordkeeping/include the option of electronic recordkeeping
- 5) DEQ functions:
- a) Inspections, oversight, enforcement authority. Note that the current Part 121 only has criminal enforcement authority, and no civil enforcement provisions.

- b) Update guidance documents once changes are made.
- 6) Discussion on self-transport of liquid industrial waste and the definition of self- transport.
Tabled for further discussion.
- 7) To do list:
- a) DEQ to send appointment notes for future meetings.
 - b) DEQ will draft language for review at the next meeting.
 - c) DEQ will provide the guidance information requested.
 - d) DEQ will begin reviewing Part 121 for regulatory conflict, overlap and duplication.
 - e) All information should be provided to Stakeholders approximately one week before the next meeting.

Meeting adjourned at approximately 3:15 pm.

Next meeting: July 8, 2014; 1:00 pm; Constitution Hall, Great Lakes Conference Room, 6th floor, South.

**Liquid Industrial Waste Workgroup
Meeting Attendance
June 10, 2014**

Attended	NAME	AFFILIATION
X	Colleen Allen	Northern A-1
	Ronda Blayer	MDEQ, OWMRP
X	John Cannon	PVS Chemical
	James Clift	Michigan Environmental Council
	Mark Eisenbarth	Muskegon County Wastewater Management
X	Bryce Feighner	MDEQ-OWMRP
	Jason Geer	Michigan Chamber of Commerce (alternate Dennis Leonard)
X	Eric Imbault	Muskegon County Wastewater Management
X	Tracy Kecskemeti	MDEQ-SEMI District Office
X	Terry Lawless	Schultz, Inc.
	Bill Lievense	Michigan Chemistry Council
X	Scott Maris	EQ – The Environmental Quality Company (alternate Mike Takacs)
	De Montgomery	MDEQ, OWMRP
X	Jeanette Noechel	MDEQ-SEMI District Office
X	Mike Pastoor	Liquid Industrial Waste Service
X	Rick Powals	Environmental Geo-Technologies, LLC
X	Kerry Puzio	Terra Contracting
X	Jack Schinderle	MDEQ, OWMRP
X	David Sheaves	Michigan Chemical Council
X	Lenora Strohm	General Motors, Real Estate & Facilities
X	Andy Such	Michigan Manufacturers Association
	Jim Sygo	MDEQ
X	Maggie Tenant	Safety-Kleen
	Brent Walter	DLD, Inc. (alternate Sharon Jols)
x	Eric Weiss	Vesco Oil Corporation
X	Pat Zombo	Consumers Energy
X	Dennis Leonard	Michigan Chamber of Commerce
X	Sharon Joles	DLD, Inc.