STATE OF MINNESOTA
MINNESOTA POLLUTION CONTROL AGENCY

In the Matter of the Proposed Amendments of Rules Governing the Management, Storage, Treatment, and Disposal of Hazardous Waste, Minn. Rules Pts. 7045.0020, 7045.0075, 7045.0528, and 7045.0628

STATEMENT OF NEED AND REASONABLENESS

I. INTRODUCTION

The subject of this proceeding is the amendment of the rules of the Minnesota Pollution Control Agency (hereinafter "Agency") governing the management, treatment, storage, and disposal of hazardous waste. The amendments will incorporate provisions promulgated by the U.S. Environmental Protection Agency (hereinafter "EPA") under authority of the Resource Conservation and Recovery Act (hereinafter "RCRA") and provisions of the Hazardous and Solid Waste Amendments of 1984 (hereinafter "HSWA").

The EPA promulgated regulations governing hazardous waste treatment, storage, and accumulation tanks in the July 14, 1986 Federal Register (51 FR 25422-25486). The July 14, 1986 federal regulations are hereinafter referred to as the federal tank regulations. On February 23, 1988, amendments to Minnesota's hazardous waste rules were adopted to incorporate regulations based on the July 14, 1986 publication. However, additional amendments are proposed to address effective dates of the requirements and to provide greater consistency with the federal regulations.

These rule amendments are proposed pursuant to the Agency's authority under Minn. Stat. § 116.07, subd. 4 (1986).

This Statement of Need and Reasonableness is divided into seven parts. Following this introduction, Part II contains the Agency's explanation of the need for the proposed amendments. Part III discusses the reasonableness of the proposed amendments. Part IV documents how the Agency has considered the methods of reducing the impact of the proposed amendments on small businesses as

required by Minn. Stat. § 14.115 (1986). Part V documents the economic factors the Agency considered in drafting the amendments as required by Minn. Stat. § 116.07, subd. 6 (1986). Part VI sets forth the Agency's conclusion regarding the amendments. Part VII contains a list of the exhibits relied on by the Agency to support the proposed amendments. The exhibits are available for review at the Agency's offices at 520 Lafayette Road, St. Paul, Minnesota 55155.

II. NEED FOR THE PROPOSED AMENDMENTS TO THE HAZARDOUS WASTE RULES

Minn. Stat. ch. 14 (1986) requires an agency proposing to adopt or amend a rule to make an affirmative presentation of facts establishing the need for and reasonableness of the proposed rules or amendments. In general terms, this means that an agency must set forth the reasons for its proposal, and the reasons must not be arbitrary or capricious. However, to the extent that need and reasonableness are separate, need has come to mean that a problem exists which requires administrative attention and reasonableness means that the solution proposed by an agency is appropriate.

Need is a broad test that does not easily lend itself to evaluation of each proposed revision. In the broad sense, the need for amendments to the Agency's rules governing the management, treatment, storage, and disposal of hazardous waste has two bases: 1) the need for consistency with the federal hazardous waste regulations, and 2) the need for rules which provide protection of human health and the environment without unduly restricting normal commerce.

In 1976, Congress adopted RCRA to regulate the management of hazardous waste. 42 U.S.C. §§ 6901 et seq. In adopting RCRA, Congress provided for eventual State control of the hazardous waste program and set up the mechanism for the EPA to grant authority to states to operate the program. In states that receive authorization, the State environmental agency administers the State program in lieu of the federal program. To receive and maintain authorization,

the State program must be "equivalent" to the federal program and consistent with federal or State programs applicable in other states. EPA has defined equivalent to mean that the state requirements are at least as stringent as federal requirements. In terms of consistency, EPA's goal is to achieve an integrated national program which requires that final State programs do not conflict with each other or with the federal program.

Pursuant to RCRA, EPA granted the Agency final authorization for its hazardous waste program, effective February 11, 1985. See 50 FR 3756 (January 28, 1985). A state with final authorization administers its hazardous waste program in lieu of the EPA program for those regulations which were promulgated pursuant to RCRA as adopted in 1976 and as amended in 1980.

However, the authorization did not extend to those federal requirements promulgated by the EPA pursuant to HSWA. A state must obtain authorization specifically under HSWA. Before the Agency can apply for authorization under HSWA, any rule amendments intended to maintain equivalency to the federal program must be in effect in Minnesota. The existing federal regulations establish specific time frames for the adoption of State rules intended to maintain equivalency to the federal rules.

Although a state program may be more stringent than the federal requirements and states are not required to adopt less stringent federal standards, the Agency believes that, as a general matter, it is desirable to maintain consistency with the federal program. Much of the hazardous waste generated in Minnesota must be sent to other states for treatment or disposal because Minnesota has no commercial disposal facilities and only very limited commercial treatment facilities. This means that many generators must be knowledgeable about requirements of both the State and federal hazardous waste programs. The need to comply with multiple sets of rules makes compliance difficult.

Therefore, to the extent it can be accomplished without posing a threat to human health and the environment, amendment of Minnesota's hazardous waste rules to incorporate EPA's amendments is desirable. Where, however, the Agency believes a more stringent requirement is needed to adequately protect public health and welfare given the available scientific evidence and technological factors, the Agency has proposed a more stringent standard. The reasonableness of these more stringent requirements is demonstrated below.

III. REASONABLENESS OF THE PROPOSED AMENDMENTS TO THE HAZARDOUS WASTE RULES

The Agency is required by Minn. Stat. ch. 14 (1986) to make an affirmative presentation of facts establishing the reasonableness of the proposed rules or amendments. Reasonableness is the opposite of arbitrariness and capriciousness. It means that there is a rational basis for the Agency's action. The reasonableness of each of the proposed amendments is discussed below.

A. Minn. Rules Pt. 7045.0020 (Definitions).

The Agency is proposing to amend Minn. Rules pt. 7045.0020 to amend two definitions of terms used throughout the proposed amendments. The definitions proposed to be amended are, "existing tank system or existing component" and "new tank system or new tank component." These two terms are based on definitions in 40 CFR § 260.10 of the federal regulations. Because the state rules are based on the federal regulations and are intended to be equivalent to those regulations the Agency tries to maintain the same definitions to the extent possible. However, the two definitions that are proposed differ somewhat from the federal regulations.

It was necessary to modify the definitions of existing tanks and new tanks from the federal definitions because the federal definitions incorporated effective dates that preceded the effective date of the State rules. Under the federal regulations, July 14, 1986 is the dividing date between new and existing

tanks. However, by incorporating the federal date into the State rules, a situation would be created where a tank built after the federal dividing date would be considered a new tank even though no State rules were in effect yet to regulate it.

In order to accomodate the federal requirements which are applicable to tanks regulated under HSWA, it is reasonable to include in these definitions a reference to the federal definition to specifically apply to those tanks. However, for tanks that are not subject to HSWA, it is reasonable to provide a definition that is only applicable to the tanks regulated under the State rules. The proposed amendments to subparts 23a and 59a, therefore, establish July 14, 1986 as the dividing point between new and existing tanks for those tanks that have been federally subject to those requirements since that date because they are regulated under HSWA. The effective date of the State rules is a reasonable dividing point between new and existing tanks that will not be regulated until the State rules become effective.

B. Minn. Rules Pt. 7045.0075 (Petitions).

Minn. Rules pt. 7045.0075, subp. 6 establishes petitioning procedures for obtaining an exception to the secondary containment requirements for tank systems. The requirements of this subpart correspond to the provisions of 40 CFR §§ 264.193(g) for permitted facilities and 265.193(g) for interim status facilities.

The federal regulations allow a person to "obtain a variance" from the secondary containment requirements of 40 CFR §§ 264.193 and 265.193. A person may demonstrate that an alternate design or operating practice will provide an equivalent level of protection of human health and the environment. The federal regulations identify the EPA Regional Administrator as the person who will decide whether a variance should be granted.

Upon authorization of the State program, this authority can be delegated to either the Agency Commissioner or the Agency. Minn. Rules pt. 7045.0075, subp. 6 establish the procedural mechanism through which the State can exercise this authority. Under the State rules, the Agency Commissioner has the authority to grant petitions for alternative design or operating practices.

Subpart 6 of the State rules establishes the requirements for petitions for alternate design or operating practices to be used in lieu of the secondary containment requirements established in Minn. Rules pts. 7045.0528, subp. 4 and 7045.0628, subp. 4. Those subparts require secondary containment for all permitted tank facilities and also for all interim status tank facilities and tanks used by generators to accumulate hazardous waste.

The substantive requirements described in proposed Minn. Rules pt. 7045.0075, subp. 6, item A are the same as those provided in the federal regulations. Item A of subpart 6 establishes the factors the Agency Commissioner must consider in evaluating the petition to determine if the proposal will provide equivalent protection. The factors to be considered relate to the waste to be contained in the tank system, the design and operating practices of the tank system, the hydrogeologic setting of the tank system, and any factors that would affect the extent of possible contamination of surface and ground water.

However, when the State rules were amended to incorporate the federal requirements for evaluating petitions, a phrase was used in the State rules which caused the State rules to be less stringent than the federal regulations. Subitem 3 of item A requires the commissioner to consider the hydrogeologic setting of the tank system in the review of the petition. The corresponding federal language requires consideration of the hydrogeologic setting of the facility. Minn. Rules pt. 7045.0020, subp. 24 defines facility as "all contiguous land, structures, other appurtenances and improvements on the land used

for treating or disposing of hazardous waste." A facility may consist of several treatment, storage or disposal operational units, such as one or more landfills, surface impoundments or combinations thereof.

Thus, a tank system may be a subset of a facility. By specifying the hydrogeologic setting of the tank system, the State rules may be addressing a smaller area and therefore may be considered less stringent than the corresponding federal requirement. It is reasonable to replace the term "tank system" with "facility" in order to provide for the review of the same scope of information as would be required under the federal regulations.

C. Minn. Rules Pt. 7045.0528 (Tanks).

Minn. Rules pt. 7045.0528 establishes the requirements for permitted tank facilities. Except as will be noted, these State rules generally correspond to the federal regulations in 40 CFR §§ 264.190 to 264.199.

Subpart 3 establishes requirements for the design and installation of new tank systems or components. This subpart requires that an assessment be conducted for all new tank systems that will attest to the design and operation of the facility so that no releases will occur. All the substantive requirements of this subpart directly correspond to the equivalent federal requirements of 40 CFR § 264.192. The proposed amendments differ from the federal regulations by establishing two points at which the required assessment is to be submitted. For tanks that are subject to the federal regulations as HSWA regulated facilities, the assessment has been required since the federally established effective date. It is therefore reasonable to clarify that the federal requirements are applicable in this case. For new tanks that have not been subject to the requirements as HSWA regulated facilities, the proposed amendments state that the required assessment is due when all other pertinent information is submitted with the Part B application. The proposed amendment is reasonable because it does not change the time frames for for the submittal of the assessment, but only clarifies the existing requirements.

The proposed amendments also add a phrase to clarify the purpose of the required assessment. The corresponding federal regulations in 40 CRF § 264.192(a) specify that the assessment will "be used by the Regional Administrator to review and approve or disapprove the acceptability of the tank system design." In order to maintain equivalency with the federal regulations it is reasonalble to provide a similar clarifying statement in the proposed rules.

The proposed rules also specify that the assessment must include, in addition to the specific information required in subitems 1 to 5 of item A, any other information that the Commissioner determines is relevant to the tank system design. This is reasonable to ensure that sufficient information will be available to evaluate tank systems that are not conventional, or to address unusual physical conditions at the tank site. The corresponding federal regulations address the potential need for additional information by specifying that the assessment must "at a minimum" address the factors identified, thus providing the option of further requests for information. These requirements are reasonable to ensure that tanks are correctly designed and installed and that corrosion protection systems are provided as necessary.

Subpart 4 establishes the requirements for the containment and detection of releases. The State rules for permitted tanks establish extensive criteria for the design of secondary containment systems, including the requirement for interstitial monitoring. The State rules specify three types of secondary containment and establish criteria for the design and construction of each type. The rules provide a fourth option for secondary containment which would be an equivalent device as approved by the Agency Commissioner through the petition process established in proposed Minn. Rules pt. 7045.0075, subp. 6.

Certain aspects of the schedule for the phase-in period for the installation of secondary containment for existing tanks have been made more stringent in the State rules than in the corresponding federal regulations. 40 CFR § 264.193(a)

establishes specific time frames for providing secondary containment. The State rules provide the same time frames as the federal regulations for new tank systems and tank systems that contain dioxin wastes. These schedules provide a reasonable balance between the need for secondary containment and the recognition that the owners or operators of existing tank systems need time to accomplish the requirements being newly imposed by the proposed amendments.

For existing tank systems or tank systems that contain a waste that at a future time becomes regulated as a hazardous waste, the Agency adopted more restrictive requirements. With regard to existing tanks, the State rules provide an accelerated schedule for compliance with the secondary containment requirements. The federal regulations base the phase-in period on the age of the tank and require that secondary containment be provided by the time the tank is 15 years old, or by January 12, 1989, whichever comes later. If the age of the tank already exceeds 15 years then secondary containment is required by January 12, 1989. The Agency believed that this mechanism for phasing-in the secondary containment requirements did not provide a reasonably rapid response to the need for secondary containment to address the concern regarding releases.

The Agency believed that a maximum of five years is a reasonable time period for phasing-in the requirements to install a secondary containment system and adopted this time period into the State rules. Five years corresponds to the term of a hazardous waste facility permit. Tank systems that have been recently permitted will be allowed to continue to operate until the permit is reissued to include the upgrading necessary to meet the new tank standards. Owners and operators of tank systems that have been permitted for several years will have the option of upgrading the system at the time the permit is reissued or doing the necessary upgrading after five years and requesting the permit be modified to reflect those changes.

However, when the Agency adopted a phase-in period for the installation of secondary containment, the adopted language did not accurately reflect the Agency's intent regarding the phase-in period for tanks that would become 15 years old before the end of the five year phase-in period. As adopted, the State rules require the installation of secondary containment by January 12, 1989 if the tank system would reach 15 years of age within five years. The Agency intended that the owners and operators of tanks that would become 15 years old within five years, be allowed to operate without secondary containment until the tank is 15 years old, or until January 12, 1989, whichever comes later. This provides a more reasonable time period, consistent with the Agency's original decision to provide a maximum period of five years and still comply with the limitations established by the federal program. Therefore, the proposed amendments allow the owners or operators of tanks that are more than ten years old on the effective date of this item, to operate without secondary containment until the tank is 15 years old or until January 12, 1989, whichever is later.

The existing State rules do not specifically address the phase-in schedule for owners or operators who do not know or cannot document the age of the tank. Under the federal regulations, such tanks are assumed to be seven years old and are given eight years to meet secondary containment requirements. If there is evidence that the tank is more than seven years old, the owner or operator must install secondary containment by the time the tank is 15 years old or by January 12, 1989, whichever comes later.

During the drafting of the State rules governing tank standards, there was considerable discussion regarding the phase-in schedule for the installation of secondary containment. As a result of these discussions it was determined that the federal phase-in schedule for existing tanks was excessive and that more stringent requirements were appropriate. This determination continues to be

relevant in those cases where the age of the tank is unknown. It is reasonable to assume that the concerns regarding tank leaks and failure are equally applicable to a tank for which no information or documentation of age is available. It is therefore reasonable to extend the Agency's determination regarding the more stingent phase-in schedule to also apply to tanks of unknown age.

To address tanks of unknown age the Agency is providing a phase-in schedule similar to the schedule provided for tanks of documentable age. The proposed phase-in schedule is based on the ability of the owner or operator to provide information or documentation that will establish the age of the tank within a general age group.

If no information is available and the age of the tank cannot be documented, the proposed amendments require that the tank be considered to be 15 years old, and secondary containment must be installed by January 12, 1989.

In some cases, the exact age of the tank my be unknown, but the owner or operator may be able to establish the age of the tank within a certain time period. For tanks that can be demonstrated to be less than ten years old, the proposed amendments provide the maximum phase-in period of five years. If the tank is between ten and 15 years of age, the proposed amendments require secondary containment by the time the tank is 15 years old or by January 12, 1989, whichever is later. This is a reasonable phase-in schedule that provides consistency with the requirements imposed on tanks of known age and with the schedule established in the federal regulations.

Subpart 9 establishes the requirements for closure and post-closure care of tank facilities. These requirements directly correspond to 40 CFR § 264.197 and require that all contaminated material at a tank facility be either removed or decontaminated at closure. The Agency proposes to amend the rule to clarify that properly decontaminated metal tanks system components shall be considered

scrap metal and, if recycled, are not subject to regulation under Minn. Rules pts. 7045.0205 to 7045.0685. The proposed amendment does not add any additional requirements for closure of tanks or for recycling of tanks as scrap metal. However, it is reasonable to provide the proposed statement of the status of recycled tanks in order to clarify the requirements to the regulated community.

D. Minn. Rules Pt. 7045.0628 (Tanks - Interim Status).

Minn. Rules pt. 7045.0628 establishes the requirements for tank facilities that are not permitted and are regulated under interim status. This part is also referenced under Minn. Rules pt. 7045.0292 as the applicable standards for generators who accumulate hazardous waste in tanks. The Agency does not propose to change any of the technical standards of the State rules. However, clarifying changes and changes to the phase-in schedule are proposed for portions of subparts 3, 4 and 9 of this part.

Subpart 3 establishes the requirements for the design and installation of new tank systems or tank system components. In general, this subpart corresponds to 40 CFR § 265.192. However, one aspect of these requirements does not correspond to the federal regulations and must be specifically addressed under the State rules. The State rules and federal regulations require the owners or operators of new tanks to prepare an assessment of the tanks's suitability for storing or treating hazardous waste. Because the federal regulations did not become effective for six months after their publication, the regulated community was provided with a reasonable time to respond to the requirement for the assessment. However, the State rulemaking procedure does not have a similar phase-in period and the State rules become effective five working days after they are published. In order to give the regulated community the opportunity to respond to the requirement to provide an assessment, the proposed rules provide six months before the required assessment must be obtained. However, this six month phase-in

period is only provided for tanks that are not currently regulated under HSWA. New, HSWA regulated tanks are already required to have conducted the necessary assessment by the federal effective date. The proposed rules reasonably distinguish between the HSWA requirements and the requirements for tanks only regulated by the State rules.

An introductory sentence has also been added to subpart 3 to specify that the requirements that follow apply to new tank systems. The addition of this sentence is reasonable to clarify the purpose of this subpart and to provide consistency with the corresponding provisions under Minn. Rules pt. 7045.0528, subp.3.

Subpart 4 establishes the requirements for the design and installation of secondary containment systems. The requirements of this subpart, with certain exceptions, correspond to 40 CFR § 265.193. The proposed amendments to this part address the phase-in period provided for the installation of secondary containment. The proposed amendments add the same phase-in period as is proposed for the permitted tank standards under part 7045.0528, subp. 4. The reasonableness of these proposed requirements and the differences between these requirements and the federal regulations are discussed in section III. C of this Statement.

Item H of subpart 4 requires secondary containment for tank ancillary equipment except under specific circumstances. Subitems (1) to (4) specify the type of equipment that is not required to be provided with secondary containment. The requirements of this item generally correspond to the requirements of 40 CFR § 265.193(f). However, the federal regulations specify that ancillary equipment is exempted from the secondary containment requirements if it is inspected for leaks on a daily basis. The State rules do not specify that the required daily inspection is for leaks and therefore could be considered less stringent than the federal regulations. It is reasonable to amend the State rules to provide the necessary statement regarding the purpose of the daily visual inspections in order to maintain consistency with the federal regulations.

Subpart 9 establishes the requirements for the closure and post-closure care of the tank systems. The requirements of this part correspond to 40 CFR § 265.197 The amendments proposed for this subpart correspond to the amendments proposed for subpart 9, of part 7045.0528. The reasonableness of the proposed amendments to this subpart are also discussed in section III. C of this Statement.

IV. SMALL BUSINESS CONSIDERATIONS IN RULEMAKING

Minn. Stat. § 14.115, subd. 2 (1986) requires the Agency, when proposing amendments to existing rules which may affect small businesses, to consider the impact of the rule amendment on small business. The objective of Minn. Stat. Ch. 116 (1986) is to protect the public health and welfare and the environment from the adverse effects which will result when hazardous waste is mismanaged. Application of less stringent standards to the hazardous wastes generated or managed by small businesses would be contrary to the Agency's mandate since small businesses' hazardous wastes can cause the same environmental harm as that of larger businesses.

The volume of hazardous waste generated by a business is not directly proportional to the size of the business. Many large businesses generate very small quantities of hazardous waste and conversely, a small business may generate a very large volume of hazardous waste. Therefore, it is not fair or reasonable to impose regulations based on the size of the business because this may have little relation to the potential for mismanagement or the extent of the adverse effects on human health and the environment if the waste is mismanaged.

Those aspects of the amendments that are based on federal regulations promulgated under HSWA are already in effect in Minnesota. Incorporation of these provisions into the State rules will not impose any additional requirements on small businesses that are not currently being imposed by the federal regulations in effect in Minnesota and elsewhere in the nation.

The portions of the amendments that are based on federal regulations promulgated under RCRA, while not yet in effect in Minnesota, must eventually be incorporated into the State rules and must be equivalent to the federal level of regulation. Again, incorporation of these requirements into the State rules will not impose any additional requirements on small businesses that would not be imposed under the federal program.

The portions of the amendments that exceed the level of regulation in the federal program are the only areas where there is the option of minimizing the impact on small businesses. The amendments provide more stringent regulation regarding some aspects of the phase-in period provided for the installation of secondary containment. These requirements are applicable to permitted and interim status tank facilities and also to full-scale generators of hazardous waste. Agency staff are not aware of any permitted or interim status tank facilities owned or operated by a small business. However, some small businesses may be generators of hazardous waste. The State rules recognize two classes of generators, full-scale and small quantity generators. The amendments provide a lower level of regulation for small quantity generators and the proposed phase-in periods are not applicable. Small businesses that are small quantity generators that accumulate waste in tanks will not be affected by the amendments. Small businesses that are full-scale hazardous waste generators that accumulate waste in tanks will be affected by the more stringent phase-in period. However, Agency staff believes that these additional regulations are justifiable and do not present an unreasonable burden to small businesses that may be subject to these requirements.

V. CONSIDERATION OF ECONOMIC FACTORS

In exercising its powers, the Agency is required by Minn. Stat. § 116.07, subd. 6 (1986) to give due consideration to economic factors. The statute provides:

> In exercising all its powers the Pollution Control Agency shall give due consideration to the establishment, maintenance, operation, and expansion of business, commerce, trade, industry, traffic, and other economic factors and other material matters affecting the feasibility and practicability of any proposed action, including, but not limited to, the burden on a municipality of any tax which may result therefrom, and shall take or provide for such action as may be reasonable, feasible, and practical under the circumstances.

In proposing the requirements of these amendments governing hazardous waste tanks, the Agency has given due consideration to available information as to any economic impacts the proposed amendments would have. The amendments will have some economic impacts for owners and operators of hazardous waste tank systems. The amendments will impact the owners and operators of hazardous waste tank systems in some cases by requiring upgrading of existing tank systems according to a more accelerated schedule than required by the federal regulations.

The federal regulations require the installation of secondary containment for existing tanks by the time the tank is 15 years old. Because the State rules have always required secondary containment for permitted tank systems, the proposed phase-in period will only be newly applicable to the owners or operators of interim status facilities and to full-scale generators who accumulate waste in tanks. The amendments also require the installation of secondary containment by the time a tank is 15 years old, but further specify a maximum time of five years from the effective date of the rules before secondary containment must be installed. The effect of this difference will be to accelerate the response time for interim status facilities and generator's accumulation tanks that are less than ten years old. Although the installation of secondary containment is inevitable under the federal program, it is required sooner under the proposed amendments and therefore will result in a more immediate expenditure for owners and operators of interim status facilities or generators with accumulation tanks that are less than ten years old.

The Agency believes that the additional expense that will be incurred as a result of the adoption of more stringent State requirements are justified by the additional environmental protection these requirements will ensure. In no case will the additional State requirements result in immediate expenditure or represent a burdensome expense to the affected owners and operators of hazardous waste tanks.

VI. CONCLUSION

The Agency has, in this document and its exhibits, made its presentation of facts establishing the need for and reasonableness of the proposed amendments to Minnesota's hazardous waste rules. This document constitutes the Agency's Statement of Need and Reasonableness for the proposed amendments to the hazardous waste rules.

VII. LIST OF EXHIBITS

The Agency is relying on the following documents to support these amendments.

Agency Ex. No.	Title
1	Federal Register, Vol. 51, No. 134, Pages 25422-25486, July 14, 1986.
2	Federal Register, Vol. 50, No. 123, Pages 26444-26504, June 26, 1985.
3	Federal Register, Vol. 51, No. 158, Pages 29430-29431, August 15, 1986.
4	MPCA Statement of Need and Reasonableness, October 16, 1987 regarding proposed amendments to hazardous waste standards.
5	Comment letters received in response to proposed amendments published in November 16, 1987 State Register.

Date: February 11, 1988

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