

STATE OF MINNESOTA
MINNESOTA POLLUTION CONTROL AGENCY

In the Matter of the Proposed Rule
Amendments Governing the Management,
Treatment, Storage, and Disposal of Hazardous
Waste, Minn. Rules Chs. 7001 and 7045

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 Agency is proposing hazardous waste rule amendments that include several and varied housekeeping measures to refine parts of the existing rules that have been identified by Agency staff, metropolitan county hazardous waste personnel, and hazardous waste generators as needing clarification or correction. The revisions fall into three categories: 1) amendments proposed solely to enhance clarity and reduce ambiguity, 2) amendments proposed to correct errors, and 3) amendments proposing minor program modifications.

The authority to adopt the proposed amendments is provided under Minn. Stat. § 116.07, subd. 4 (1992).

This Statement of Need and Reasonableness is divided into six 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 (1992). Part V discusses the economic factors the Agency considered in drafting the amendments as required by Minn. Stat. § 116.07, subd. 6 (1992). Part VI sets forth the Agency's conclusion regarding the amendments.

II. NEED FOR THE PROPOSED AMENDMENTS

Minn. Stat. ch. 14 (1992) requires an agency to make an affirmative presentation of facts establishing the need for and reasonableness of the rules or amendments proposed. 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 lend itself to evaluation of each proposed revision. In the broad sense, the need to amend the Agency's hazardous waste rules is the ongoing need to improve the accessibility of the rules for hazardous waste generators and to improve the enforceability of the rules for the Agency by improving the clarity and readability of the rules. This rulemaking is in direct response to needs expressed by Agency and metropolitan county staff and by the regulated community. Clear and unambiguous administrative rules are a goal of both the regulated community and the Agency. In addition, the Agency has a need to correct errors in previous rulemakings, specifically in the area where the State's hazardous waste rules must be in conformance with federal regulations in order for the State to retain its authorization to administer the State hazardous waste program in lieu of the federal hazardous waste program (Code of Federal Regulations, part 272, subpart Y).

III. REASONABLENESS OF THE PROPOSED AMENDMENTS

The Agency is required by Minn. Stat. ch. 14 (1992) to make an affirmative presentation of facts establishing the reasonableness of the proposed rules or amendments. The reasonableness of the proposed amendments to the State hazardous waste rules is discussed below.

MINN. RULES PT. 7001.0620 PART B INFORMATION REQUIREMENTS FOR LANDFILLS.

The cross-reference to Minn. Rules pt. 7045.0538, Subp. 3, item G is changed to item I. This citation revision was omitted in error during a previous rulemaking (15 SR 1877) when additional items were added to Minn. Rules pt. 7045.0538, subp. 3. The requirements for landfill design remain the same. This amendment adds that these requirements must be addressed in permit information.

MINN. RULES PT. 7001.0712 RESEARCH, DEVELOPMENT, AND DEMONSTRATION PERMITS

The exemption from permits for "facilities meeting the treatability study exemption requirements of part 7045.0121" is already provided under Minn. Rules pt. 7045.0121. The language is added to this part to serve as a pointer to Minn. Rules pt. 7045.0121 and without changing the existing requirements.

MINN. RULES PT. 7045.0020 DEFINITIONS.

Subp. 73d. Record or record keeping. The definition includes both printed and electronically stored information. This definition is provided specifically to allow computer records to meet Agency record keeping requirements. The Agency has been accepting such record keeping for several years and wants to incorporate electronic record keeping into the administrative rule to make clear their policy.

Subp. 73f. Regional Administrator. "Regional Administrator" has not been previously defined even though it is used in Minn. Rules pts. 7045.0470 and 7045.0576. Generator and facility operator inquiries indicate that a definition is needed.

MINN. RULES PT. 7045.0102 MIXTURES OF WASTES.

Subp. 2. Mixtures of hazardous and nonhazardous wastes. The term "extraction procedure (EP) toxicity" is changed to "toxicity" and the term "toxicity" is changed to "lethality." These amendments were previously presented and supported in the Agency's toxicity characteristic rulemaking (15 SR 1878). A separate rulemaking (hazardous waste clarifications - 16 SR 197) affecting Minn. Rules pt. 7045.0102 was promulgated concurrently and retained the obsolete terms, creating an apparent conflict. The Revisor of Statutes has advised the Agency that the 16 SR 197 rulemaking overrides the toxicity characteristics rulemaking due to its timing. The override affects subp. 2, item D only. The Agency therefore promulgates this provision again in order to eliminate the apparent conflict.

MINN. RULES PT. 7045.0120 EXEMPTIONS AND SPECIAL REQUIREMENTS.

Subp. 1. Exempt types of waste. Under item A, household waste is an exempt waste. The phrase "except for collected household hazardous waste and collected spent or waste household batteries which must meet the requirements of subp. 2 as specified" is added. The Agency in a recent rulemaking (16 SR 2102) amended this rule part by separating collection program requirements and relocating them in subp. 2. The Agency did not at that time revise subp. 1 to reflect that change. The requirements for collected household hazardous waste and collected household batteries were in effect

prior to March 30, 1992 (16 SR 2102). The post March 30, 1992 language is unclear and the proposed language will rectify that ambiguity.

MINN. RULES PT. 7045.0125 MANAGEMENT OF WASTE BY USE, REUSE, RECYCLING, AND RECLAMATION.

In subparts 7, 8, and 9, the phrase "except as provided in subp. 3a, 4, 5, or 6" is changed to "unless exempted specifically in this part." There is no change in this rule provision except to provide clearer language as suggested by the regulated community.

MINN. RULES PT. 7045.0133 EXEMPTION FROM REGULATION DUE TO LETHALITY.

The language is changed from "a specific generator's waste that meets any of the lethality characteristics" to "a generator's waste which exhibits the characteristics of lethality." The revision is for clarity only. The provision is also amended to extend the exemption to include the land disposal restriction requirements found in Minn. Rules pts. 7045.1300 to 7045.1380. It is reasonable to extend the exemption from hazardous waste regulation to the land disposal restrictions if the generator meets the requirements generally exempting him or her from hazardous waste regulation.

MINN. RULES PT. 7045.0206 GENERATOR SIZE DETERMINATION.

The language in subps. 2 to 5 is reworded for clarity only. There is no change in the criteria for or method of determining generator size.

MINN. RULES PT. 7045.0208 HAZARDOUS WASTE MANAGEMENT.

Subp. 2. Abandonment. This part is expanded to explicitly state that abandonment of hazardous waste is prohibited. Currently Minn. Rules pt. 7045.0208 provides a listing of specific methods that a generator must use

to treat or dispose of his or her hazardous waste. The existing rule implies but does not explicitly state that the waste cannot be abandoned. The rule does already state that the generator cannot relinquish waste "if the generator has reason to believe that the hazardous waste will not be properly managed." The concept of abandonment is widely understood in the field of hazardous waste management. It is reasonable to explicitly state that abandonment is prohibited to avoid confusion on the part of the regulated community and to ease appropriate enforcement.

MINN. RULES PT. 7045.0214 EVALUATION OF WASTES.

Subp. 1. General requirement. The requirement for a generator to evaluate her or his waste is a long standing requirement based on comparable federal law (Code of Federal Regulations, title 40, part 262.11). This part is amended to include a 60 day time limit for the generator to make a waste evaluation. Sixty days from the date of initial generation is a reasonable amount of time because the generator under current rule (Minn. Rules pt. 7045.0240) must submit a license application within 75 days of first producing a hazardous waste. A generator needs to have completed the waste determination prior to preparing an application which includes detailed management plans for each hazardous waste stream.

Subp. 4. Laboratory waste. This provision is relocated from Minn. Rules pt. 7045.0230 (Content of License Application) since it addresses evaluation and testing rather than application requirements.

MINN. RULES PT. 7045.0215 TIMING OF WASTE EVALUATION.

Subp. 1. Individual wastes; combined wastes. See Minn. Rules pt. 7045.0214, subp. 1.

MINN. RULES PT. 7045.0230 CONTENT OF LICENSE APPLICATION.

Subp. 1. Information required. The deletion of the parentheses is a grammatical change only.

Subp. 4. Laboratory waste. This provision is deleted as part of the license application and relocated in Minn. Rules pt. 7045.0214 (Evaluation of Wastes) because it addresses evaluation and testing.

MINN. RULES PT. 7045.0240 SUBMITTAL OF LICENSE APPLICATION.

Subp. 3. License application submittal. The phrases "submitted to" and "submittal" are changed to "received by" and "receipt." Under current rule a generator must withhold action (treatment or disposal) on his or her hazardous waste for 15 days, allowing the Agency a short time period to deny the generator's proposed action. After 15 days, the generator may proceed with the proposed action thereby not delaying their business practices until the Agency takes formal action on their license application at a later date. This procedure is not proposed for amendment but the start date of the 15 day waiting period is proposed for amendment. The Agency formally date stamps all incoming mail; therefore, the proposed language change to Agency "receipt" is more consistent in its application.

MINN. RULES PT. 7045.0243 TERM AND CONDITIONS OF LICENSE.

Subp. 3. General conditions. See Minn. Rules pt. 7045.0240, subp. 3.

MINN. RULES PT. 7045.0248 LICENSE RENEWAL APPLICATION.

Subpart 1. Applicability. The deletion of the parentheses is a grammatical change only. The term "proposed" is deleted. While the treatment or disposal methods will be at the proposal stage when an application is

initially made (part 7045.0230) the methods will be actual at the time of license renewal.

Subp. 3. Recycled waste. The term "report" is changed to "application." The terminology was revised from "disclosures" and "reports" to "license applications" in the Agency's licensing rulemaking (16 SR 2102). This change is made for consistency.

MINN. RULES PT. 7045.0250 LICENSE REVOCATION.

This provision was originally introduced in the Agency's licensing rulemaking (16 SR 2102) and was based on a similar revocation provision in the Agency's facility permitting rules (Minn. Rules pt. 7001.0730). The conjunction between items B and C is "and" in error. The proposed amendment changes the conjunction to "or," allowing the Agency to revoke for any of the cited conditions rather than requiring all of the cited conditions to exist.

MINN. RULES PT. 7045.0292 ACCUMULATION OF HAZARDOUS WASTE.

Subpart 1. Large quantity generator.

Item C. This provision requires that waste accumulation start dates be clearly marked on the container or tank, or that a legible and available log be maintained. This amendment is reworded for clarity. In addition, where previously the log option was available only for tanks, this amendment extends the log option to containers. If maintained correctly, the log option has provided sufficient access to waste accumulation start dates for Agency inspection personnel in the past. Agency staff maintains that it is reasonable to extend the log option to containers for businesses that prefer this option, especially since several businesses now have tankers empty their containers.

Item D. The requirement for United States Department of Transportation labeling and marking is deleted from this part because it is fully addressed under Minn. Rules pt. 7045.0270 (Pretransport Requirements). Including this provision under the accumulation requirements is a confusing duplication and is different from the federal regulations (Code of Federal Regulations, title 40, part 262.34) upon which the State rules are based.

Item G. The requirement for shading containers from sunlight is deleted from this part because it is redundant. Item B requires the generator to meet the requirements of Minn. Rules pt. 7045.0626 (Use and Management of Containers). Minn. Rules pt. 7045.0626, subp. 4 contains a shading requirement that encompasses the requirements of this deleted provision.

Item I. The phrase "waste analysis for restricted wastes" is added for language consistency only. It is the descriptive phrase for Minn. Rules pt. 7045.1315, subp. 1, item D which was amended to the rule previously (16 SR 2239).

Subp. 2. Starting date. The change provides specific start date information for all size categories. There is no change to the requirements other than location within the rule.

Subp. 5. Small quantity generator.

Item C. See subp. 1, item C.

Item D. See subp. 1, item D.

Item G. See subp. 1, item G.

Item I. A small quantity generator, as defined under Minn. Rules pt. 7045.0206, is required to meet the requirements of Minn. Rules pt. 7045.1315, subpart 1, item D related to waste analysis for restricted wastes. This requirement is consistent with federal law (Code of Federal

Regulations, title 40, part 268). The State must be consistent with federal law in order to retain authorization to administer the State hazardous waste program. The land disposal restriction rulemaking (16 SR 2239) provides further documentation on land disposal restriction requirements.

Subp. 6. Very small quantity generator.

Item A. The accumulation start date information and related days to shipment requirement is relocated in item J.

Item C. See subp. 1, item C.

Item D. See subp. 1, item D.

Item G. See subp. 1, item G.

Item J. A very small quantity generator, as defined under Minn. Rules pt. 7045.0206, is required to meet small quantity generator requirements if the generator accumulates greater than 1,000 kilograms of hazardous waste at any one time. This requirement is consistent with federal law (Code of Federal Regulations, title 40, part 261.5(g)(2)). The State must be consistent with federal law in order to retain authorization to administer the State hazardous waste program.

Subp. 8. Satellite accumulation. The amendments propose the repeal of the record keeping requirement for satellite accumulation. The existing rule requires generators to inspect the satellite containers and areas weekly and to keep a written record of the inspection. The federal regulation upon which the State rule is patterned does not contain this requirement because the U.S. Environmental Protection Agency (EPA) maintains that satellite accumulation at the site of waste generation, as distinct from waste accumulation in other areas of the plant or business, is already by rule "under the direct control of the operator of the process generating the waste" (part 7045.0292, subpart 8,

item A and Code of Federal Regulation, title 40, part 262.34). EPA has determined the operator's control to be sufficient oversight. Agency staff re-examined the need for this provision and determined that satellite accumulation did not present a sufficient risk to justify the more restrictive record keeping requirement and is therefore reasonable to repeal.

Language modifications are also proposed for this part to specify more clearly what the generator's responsibilities are under the current law. The waste accumulation start date is the date on which the prescribed volume limit is reached. Additionally, the entire amount of satellite accumulated waste must be transferred to the storage area within three days of reaching the prescribed limit. The language change is in response to repeated questioning from the regulated community.

Subp. 10. Time extension. This amendment provides that the extension that has been available by rule for several years must now be requested in writing. This amendment also provides for the submittal of specific basic information on the request. The Agency has in the past generally been implementing the time extension provision in the manner now specified. The amendment is proposed to provide clarification and consistency.

MINN. RULES PT. 7045.0294 RECORD KEEPING.

Subp. 3a. Training records. The requirement for documentation of training records has been mandated for several years in Minn. Rules pt. 7045.0292 which incorporates by reference Minn. Rules pt. 7045.0558. Unfortunately the requirement is often difficult to find. The Agency intends to use this part of the rule to list all of the generator hazardous waste record keeping requirements for easier access. This amended provision

functions as a pointer to already existing requirements. There is no change in the requirement.

Subp. 5. Location of records. Training records must now be located at the licensed site. This requirement is currently mandated for other generator record keeping documents. It is reasonable to require all documents to be located at the license site so that they can be reviewed by Agency staff during inspections.

MINN. RULES PT. 7045.0464 ARRANGEMENTS WITH LOCAL AUTHORITIES FOR EMERGENCIES.

Subp. 1. Arrangements required. The phrase "location of storage and accumulation areas within" replaces "layout of" because the new phrase more clearly states the requirement. This is a clarification and not a change in the requirements.

Subp. 3. Record keeping. Facility operators are currently required to attempt to make arrangements with local authorities for emergencies. They are not specifically required to document that attempt. This amendment would require documentation of their attempts. It is reasonable to require documentation of mandatory requirements in order to ascertain compliance. The amendment does not require additional letters or plans to be written but simply requires the documentation of the materials. Most facility operators are already doing this as part of good business practice.

MINN. RULES PT. 7045.0468 EMERGENCY PROCEDURES.

Throughout this part (subps. 2, 3, 4, 7, and 8) the phrase "event that requires the implementation of the contingency plan" replaces the more ambiguous "emergency event" or "release, fire, or explosion." It is reasonable to reference the contingency plan as the primary emergency document for

implementation of emergency procedures since that is exactly what a contingency plan is designed to do. Referencing the contingency plan should alleviate some of the ambiguity associated with when to implement emergency procedures. This should not constitute a substantial change to the existing rules since it is offered primarily for clarification and also to provide consistency in the enforcement of the rule.

Subp. 5. Report on released material. The reference to Code of Federal Regulations, title 40, part 1510 is deleted because part 1510 has been repealed from federal regulation. The emergency coordinator is still required to contact the Agency's "duty officer" (the correct term replacing the obsolete term: "emergency response unit") and the National Response Center.

Subp. 6. Duty to notify. The phrase "emergency coordinator" replaces the phrase "hazardous waste coordinator." "Emergency coordinator" is the phrase used throughout the emergency and contingency planning parts of the rules. This is a clarification and not a change.

MINN. RULES PT. 7045.0470 POST EMERGENCY REQUIREMENTS.

Subp. 1. Cleanup. See Minn. Rules pt. 7045.0468, subps. 2, 3, 4, 7, and 8.

MINN. RULES PT. 7045.0488 CLOSURE ACTIVITIES.

Subp. 4. Certification of closure. The current rules require that closure certifications be submitted for surface impoundments, waste piles, land treatment, and land disposal units. The proposed rule expands this universe to container storage areas, tank systems, miscellaneous units, and thermal treatment units. It is important that the closure of all permitted units be certified so that both the decontamination methods and decontamination levels

can be verified because the incomplete decontamination of such units may pose significant future environmental contamination.

MINN. RULES PT. 7045.0526 USE AND MANAGEMENT OF CONTAINERS.

Subp. 8. Special requirements for incompatible wastes. The term "stored" is replace by "located." The term "stored" has a specific meaning in hazardous waste management rules (Minn. Rules pt. 7045.0020, subp. 87) which does not meet the intent of this provision. General terminology ("located") related to the proximity of the incompatible wastes is clearer and more appropriate for this requirement. The phrase "in other containers, piles, open tanks, or surface impoundments" is deleted because it is unnecessary to designate specific containment options since all types are included. The amendment provides that the incompatible wastes be "adequately" separated. This had been implied previously since Minn. Rules pt. 7045.0626, subp. 6, relating to containers and incompatible wastes states: "The purpose of this requirement is to prevent fires, explosions, gaseous emissions, leaching, or other discharge of hazardous waste or hazardous waste constituents which could result from the contact or mixing of incompatible wastes or materials."

MINN. RULES PT. 7045.0534 WASTE PILES.

Subp. 9. Special requirements for incompatible wastes. See Minn. Rules pt. 7045.0526, subp. 8.

MINN. RULES PT. 7045.0568 ARRANGEMENTS WITH LOCAL AUTHORITIES FOR EMERGENCIES.

Subp. 1. Arrangements required. The phrase "location of storage and accumulation areas within" replaces "layout of" because the new phrase more

clearly states the requirement. This is a clarification and not a change in the requirements.

Subp. 3. Record keeping. Interim facility operators and generators are currently required to attempt to make arrangements with local authorities for emergencies. They are not specifically required to document that attempt. This amendment would require documentation of their attempts. It is reasonable to require documentation of mandatory requirements in order to ascertain compliance. The amendment does not require additional letters or plans to be written but simply requires the documentation of the materials.

MINN. RULES PT. 7045.0574 EMERGENCY PROCEDURES.

See Minn. Rules pt. 7045.0468.

MINN. RULES PT. 7045.0576 POST EMERGENCY REQUIREMENTS.

Subp. 1. Cleanup. See Minn. Rules pt. 7045.0468, subps. 2, 3, 4, 7, and 8.

MINN. RULES PT. 7045.0596 CLOSURE ACTIVITIES.

Subp. 4. Certification of closure. See Minn. Rules pt. 7045.0488, subp. 4.

MINN. RULES PT. 7045.0610 COST ESTIMATE FOR FACILITY CLOSURE.

Subp. 1. Cost estimate requirements. The requirement that the cost estimate be based on the costs to the owner or operator of hiring a third party to close the facility is changed from optional to mandatory. This is consistent with federal regulation (Code of Federal Regulations, title 40,

part 264.142) which the State rule is based on. The optional language ("may") was promulgated in error (11 SR 1605) and is proposed for correction.

MINN. RULES PT. 7045.0626 USE AND MANAGEMENT OF CONTAINERS.

Subp. 6. Special requirements for incompatible waste. See Minn. Rules pt. 7045.0526, subp. 8.

MINN. RULES PT. 7045.0632 WASTE PILES.

Subp. 6. Special requirements for incompatible waste. See Minn. Rules pt. 7045.0534, subp. 9.

MINN. RULES PT. 7045.1010 COUNTY ORDINANCES.

Subp. 1. Agency approval. The phrase "or portion of the ordinance" is added allowing the Agency to approve or suspend portions of a county's hazardous waste ordinance. Without this addition the Agency is limited to approving or suspending a county's entire proposed ordinance within 30 days of receipt. If a portion of the county's ordinance is in question or under discussion, then the Agency is forced to suspend the entire ordinance until a resolution was reached. It is reasonable for the Agency to have the ability to evaluate and disapprove portions of the ordinances separately because over the past decade the ordinances have become substantially more complex.

MINN. RULES PT. 7045.1315 WASTE ANALYSIS FOR RESTRICTED WASTES.

Subp. 1. Applicability. The phrase "in the facility's file" is amended to read "on site in the generator's file." The word "facility" is confusing

for the regulated community since it is used specifically for treatment, storage, and disposal facilities.

MINN. RULES PT. 7045.1360 TREATMENT STANDARDS EXPRESSED AS SPECIFIED

TECHNOLOGIES.

In subparts 9 and 10, U139 (iron dextran) is deleted. Iron dextran was previously removed from the Agency's listing as a hazardous waste based on an earlier U.S. Environmental Protection Agency amendment (16 SR 197). Iron dextran was erroneously included in the Agency's land disposal restrictions rulemaking (16 SR 2239).

IV. SMALL BUSINESS CONSIDERATIONS IN RULEMAKING

In order to comply with Minn. Stat. § 14.115 (1992), the Agency has considered the following methods for reducing the impact of the proposed rules on small businesses.

1. The establishment of less stringent compliance or reporting requirements;
2. The establishment of less stringent schedules or deadlines for compliance or reporting requirements;
3. The consolidation or simplifications of compliance or reporting requirements;
4. The establishment of performance standards for small businesses to replace design or operational standards in the rule; and
5. The exemption of small businesses from any or all requirements of the rule.

The proposed amendments for clarifying the hazardous waste rules will not have a negative impact on small businesses since the amendments are generally offered to reduce ambiguity in the current rules. Many of the clarifications are proposed in order for small businesses that generate hazardous waste to more

easily understand Minnesota's hazardous waste requirements. The minor modifications to the hazardous waste rules such as the repeal of the satellite accumulation record keeping requirement reduce the regulatory requirements for all businesses, including small businesses. The State hazardous waste rules have incorporated as part of their basic premise, not new to this rulemaking, that Very Small Quantity Generators (as defined in Minn. Rules pt. 7045.0206) are regulated under less restrictive hazardous waste rules. While not directly comparable, often Very Small Quantity Generators are also small businesses.

V. CONSIDERATION OF ECONOMIC FACTORS

In exercising its powers, the Agency is required by Minn. Stat. § 116.07, subd. 6 (1992) 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 that may result therefrom, and shall take or provide for such action as may be reasonable, feasible, practical under the circumstances.

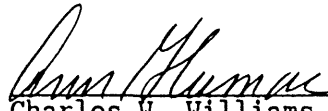
The proposed amendments for clarifying already existing rules will not have a negative economic impact. The clarifications are proposed in direct response to needs expressed by the regulated community and by Agency staff. As stated in section II, clear and unambiguous administrative rules are a goal of both the regulated community and the Agency. As a broad goal, clear communication between the regulating Agency and the regulated community can have a positive economic effect by providing efficiency of implementation.

VI. CONCLUSION

The Agency, in this document, makes its presentation of facts establishing the need for and reasonableness of the proposed rule amendments to Minnesota's hazardous waste rules. The Agency has also stated in this document that the proposed amendments will not adversely affect small businesses and will not incur greater economic costs. This document constitutes the Agency's Statement of Need and Reasonableness for the proposed rule amendments.

Date:

February 9, 1993

for 

Charles W. Williams
Commissioner

