



## MEMORANDUM OF RESPONSE

To: Jacob Ritzenthaler, Regulatory Policy Advocate

From: Mandi Payton, Agency Rules Coordinator

Date: September 19, 2017

Memorandum of Response to CSI Review – CSI Review – Hazardous Waste Set-O  
(OAC 3745-50-10, 3745-50-28, 3745-50-31 through 3745-50-35, 3745-50-37, 3745-50-46, 3745-50-49, 3745-50-58, 3745-51-01, 3745-51-02, 3745-51-07, 3745-51-23, 3745-51-39, 3745-51-40, 3745-51-41, 3745-52-10, 3745-52-12, 3745-52-23, 3745-52-41, 3745-52-50, 3745-52-60, 3745-52-205, 3745-53-10, 3745-53-11, 3745-53-20, 3745-54-12, 3745-54-16, 3745-54-71, 3745-54-76, 3745-54-77, 3745-54-93, 3745-54-94, 3745-54-99, 3745-55-74, 3745-56-71, 3745-56-72, 3745-56-76, 3745-57-91, 3745-65-12, 3745-65-16, 3745-65-33, 3745-65-71, 3745-65-76, 3745-65-77, 3745-65-94, 3745-66-74, 3745-66-77, 3745-67-30, 3745-67-57, 3745-67-82, 3745-68-13, 3745-266-70, 3745-266-80, 3745-266-101, 3745-266-200, 3745-270-05, 3745-270-06, 3745-270-44, 3745-273-08, 3745-273-20, 3745-273-40, 3745-273-56,

Subject: and 3745-273-70)

### Recommendations

On September 19, 2017, Ohio EPA received the Recommendations for the Division of Environmental Response and Revitalization's Hazardous Waste Set O Rules Package.

The CSI memorandum stated that:

"The business community impacted by these rules includes every business in Ohio that generates, treats, stores, transports, or disposes of hazardous waste. The adverse cost of obtaining permits for treating, storing, and disposing hazardous waste is created by these rules. OEPA estimates the cost of obtaining these permits to be over \$100,000. Additionally, the rules include fees regarding hazardous material disposal and treatment, which are established in state statute. After reviewing the proposed rules and the BIA, the CSI Office has determined that the rules satisfactorily meet the standards espoused by the CSI Office, and the purpose of the rule package is justified.

For the reasons described above, the CSI Office has no recommendations on this rule package.

Based on its review of the proposed rule package, the CSI Office recommends the Ohio Environmental Protection Agency should proceed in filing the proposed rules with the Joint Committee on Agency Rule Review."

### Next Steps

At this time, it is Ohio EPA's plan to move forward with the original filing of these rules with the Joint Committee on Agency Rule Review.

If you have any questions, please contact Mandi Payton at 614-644-3134.