

MEMORANDUM OF RESPONSE

To: Caleb White, Business Advocate

From: Mandi Payton, Rules Coordinator

Date: December 20, 2023

Memorandum of Response to CSI Review – Solid Waste Transfer Facility Rules

(OAC 3745-555-01, 3745-555-02, 3745-555-10, 3745-555-20, 3745-555-110, 3745-555-120, 3745-555-130, 3745-555-140, 3745-555-150, 3745-555-200, 3745-555-210, 3745-555-215, 3745-555-216, 3745-555-300, 3745-555-310, 3745-555-320, 3745-555-400, 3745-555-500, 3745-555-510, 3745-555-520, 3745-555-610, 3745-555-615, 3745-555-620, 3745-555-650, 3745-555-670, 3745-555-690,

Subject: and 3745-555-700)

Recommendations

On December 20, 2023, Ohio EPA received the recommendations for the Ohio EPA's Division of Material and Waste Management's Solid Waste Transfer Facility (OAC 3745-555-01, 3745-555-02, 3745-555-10, 3745-555-20, 3745-555-110, 3745-555-120, 3745-555-130, 3745-555-140, 3745-555-150, 3745-555-200, 3745-555-210, 3745-555-215, 3745-555-216, 3745-555-300, 3745-555-310, 3745-555-320, 3745-555-400, 3745-555-500, 3745-555-510, 3745-555-520, 3745-555-610, 3745-555-615, 3745-555-620, 3745-555-650, 3745-555-670, 3745-555-690, and 3745-555-700) rules.

In summary, the CSI memorandum stated that:

“The business community impacted by the rules includes the owners and operators of solid waste transfer facilities. The adverse impacts created by the rules include the costs associated with obtaining a permit to install which involves fees and the requirement to obtain a license, the costs associated with the requirement to establish a financial assurance for closure prior to receiving a license, costs related to construction requirements, closure costs, and the costs associated with implementing a contingency plan, keeping a daily log of operations, as well as preparing and submitting an annual report.

Based on the information above, the CSI Office has no recommendations on this rule package.

The CSI Office concludes that OEPA should proceed in filing the proposed rules with the Joint Committee on Agency Rule Review.”

Next Steps

Currently, 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 amanda.payton@epa.ohio.gov.