

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20410

OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

JANUARY 13, 1988

Michael E. Young
Environmental Compliance Officer
Atlantic Research Corporation
Propulsion Division
7511 Wellington Road
Gainesville, VA 22065-1699

Dear Mr. Young:

This is in response to your November 30, 1987 letter to Michael Petruska concerning your hazardous waste container storage areas.

The storage areas you describe appear to be satellite accumulation areas. A satellite accumulation area must be at or near any point of generation where wastes initially accumulate. The satellite accumulation area should also be under the control of the person operating the waste generation process, and your operation appears to meet these criteria.

If ARC accumulates no more than 55 gallons of hazardous waste or one quart of acutely hazardous wastes at each satellite area and follows the other requirements of 40 CFR 262.34(c), the areas would not be subject to permitting, interim status, or the requirements for generator storage at Section 262.34(a).

If you have further questions in this area, please continue to communicate with Michael Petruska of my staff at (202) 475-8551.

Sincerely

Marcia E. Williams
Director
Office of Solid Waste

ATLANTIC RESEARCH CORPORATION
ROPULSION DIVISION 7511 WELLINGTON RD., GAINESVILLE, VIRGINIA 22065-1699 703-642-6000

November 30,1987

Mr. Michael Petruska
Environmental Protection Agency
OSW-WH562
401 M Street, SW
Washington, DC 20460

Dear Mr. Petruska

Atlantic Research Corporation (ARC) requests a formal clarification of CFR 40 Section 262.34(c) (1) as it pertains to our facility at 5945 Wellington Road in Gainesville, Virginia. The plant, which is 420 acres and comprised of approximately 150 small buildings, manufactures solid rocket propellant. In it's operations, ARC generates waste chemicals which are accumulated in containers located in storage sheds outside of the buildings generating the materials. The waste chemicals are accumulated outside of the buildings for safety reasons due to the explosive nature of the work conducted. The waste chemical containers are moved from the storage shed once they are filled and taken to our waste chemical storage facility where the start accumulation begins and arrangements for off-site disposal at a TSD facility are made.

ARC believes that the storage sheds described above satisfy the requirements for satellite storage as described in CFR 40 Section 262.34(c) (1). ARC's storage sheds are located as close as safety permits to the operation generating the waste chemicals and no more than one container per material is located in any single shed. ARC consulted EPA's Industry Assistance Group about our storage facilities. The Industry Assistance personnel stated our facilities do fall under the definition of CFR 40 Section 262.34(c) (1) and referred us to you for a written confirmation of their interpretation.

If you have any questions or need additional information, contact me at (703) 642-6411.

Sincerely,

Michael E. Young
Environmental Compliance Officer

MY/as

FaxBack # 11317

