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SATELLITE ACCUMULATION AREA AND REGULATIONS

February 11, 1987

Brent C. Bradford  
Executive Secretary  
Utah Solid and Hazardous Waste Committee  
288 North 1460 West  
P.O. Box 16690  
Salt Lake City, Utah 84116-0690

Dear Mr. Bradford:

Robert Duprey, Director of the Waste Management Division in Region VIII, forwarded your letter of January 8, 1987 to this Office. This letter contains our response to the questions you raised regarding issues relating to the Federal regulations for satellite accumulation under 40 CFR 262.34(c).

1. What is the intent of the Federal regulation with respect to the total amount (volume) of hazardous waste at each satellite accumulation area?

A generator may accumulate as much as 55 gallons of hazardous waste, or one quart of acutely hazardous waste, in containers at or near any point of generation where the waste initially accumulates and which is under the control of the operator of the process. EPA believes that only one waste would normally be accumulated at each satellite are, and that the exempted accumulation should be limited to 55 gallons. Although the total amount of hazardous waste that may be accumulated at any one satellite area is limited to 55 gallons, EPA intentionally did not limit the total number of satellite areas at a generator's facility nor specify the size of the containers to be used for accumulation (though we believe many facilities will use 55-gallon drums).

2. Does the Federal regulation limit the number of containers that can be placed at a satellite accumulation area?

The Federal regulations do not limit the number of containers that can be placed at a satellite accumulation area, rather, the regulations limit the total gallons accumulated to

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55.

3. As described in the Utah proposed interpretation, will Utah be equivalent to the Federal regulations if the State allows more than 55 gallons of hazardous waste to be accumulated in more than one drum..., but require personnel training, preparedness and prevention and contingency plans?

No, a "satellite accumulation area" is limited to a total accumulation of 55 gallons, not 165 gallons as proposed.

4. Is Utah's interpretation of "three days" to mean three "working" days equivalent to EPA's intent?

Yes.

5. Will Utah be equivalent to EPA if we require that the date be placed on the full drum?

Yes, if a facility uses 55-gallon drums, then the date excess accumulation began must be clearly marked on the drum.

I trust that the above discussion answers your questions and concerns relating to the Federal satellite accumulation requirements. If not, Chet Oszman of my staff (202-382-4499) is willing to provide clarification as needed.

Sincerely,

Susan E. Bromm  
Acting Director  
Permits and State Programs Division

cc: Kent Gray, State of Utah  
Robert Duprey, Region VIII  
Patricia Brechlin, Region VIII  
Chester Oszman, PSPD

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