



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF  
LAND AND EMERGENCY  
MANAGEMENT

Date: 11.19.2021

### **COVERSHEET: EXPLANATION OF CITATION AND/OR TERMINOLOGY CHANGES IN THIS POLICY DOCUMENT**

This policy document remains wholly in effect, but some or all of the regulatory citations within it have changed. These changes do not alter the existing regulatory interpretations.

As part of the [2016 Hazardous Waste Generator Improvements Rule](#), many of the regulations that apply to hazardous waste generators were moved to, or reorganized within, title 40 of the Code of Federal Regulations (CFR) part 262. To view a crosswalk between the old and new citations, please visit the [Hazardous Waste Generator Regulations Crosswalk webpage](#).

The Hazardous Waste Generator Improvements Rule also made changes to terms that may be included in this document. The most common term change was replacing “conditionally exempt small quantity generators” (CESQGs) with “very small quantity generators” (VSQGs). In addition, EPA defined the term “central accumulation area” (CAA) to mean a generator’s 90- or 180-day accumulation area for hazardous waste.

A handwritten signature in cursive script that reads "Jessica Young".

Jessica Young  
Chief of the Recycling and Generator Branch  
Office of Resource Conservation and Recovery

9453.1989(03)

## RCRA/SUPERFUND HOTLINE MONTHLY SUMMARY

AUGUST 89

### 2. Generator Satellite Accumulation/Counting Requirements

A generator accumulates hazardous waste in a satellite accumulation area pursuant to 40 CFR Section 262.34(c) standards. The generator also generates other RCRA hazardous waste elsewhere on-site. When determining generator status, must a generator count the waste collecting in the satellite accumulation area or count it once it enters the generator storage area?

To determine their generator status, generators must count all hazardous waste generated at their facility in a calendar month. Wastes not included in the monthly determination are identified in Section 261.5(c). These are wastes either not subject to regulation or subject to only the notification and reporting requirements in Sections 262.11, 262.12, 262.40(c) and 262.41. Wastes stored in the satellite accumulation area are subject to certain container standards (e.g., Sections 265.171, 265.172, and 265.173(a)). These regulations are not among those listed in 261.5(c). Therefore, wastes in the satellite accumulation must be included in the generator's monthly waste quantity determination.

Source: Emily Roth (202) 382-4777

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