



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
LAND AND EMERGENCY
MANAGEMENT

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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 black ink that reads "Jessica Young". The signature is written in a cursive, flowing style.

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

9453.1990(01)

RCRA/SUPERFUND HOTLINE SUMMARY

APRIL 1990

I. SIGNIFICANT QUESTIONS AND RESOLVED ISSUES-APRIL 1990

A. RCRA

1. Satellite Accumulation Standards for Small Quantity Generators

Can small quantity generators establish satellite accumulation areas according to 40 CFR 262.34(c) for their hazardous waste?

Yes, according to the March 24, 1986 Federal Register (51 FR 10146) "100-1000 kg/mo generators may accumulate up to 55 gallons of non-acutely hazardous waste in satellite areas without meeting the storage requirements being promulgated today, so long as the requirements of Section 262.34(c) are met." (51 FR 10162) All generators subject to 40 CFR 262.34 may develop satellite accumulation areas for hazardous waste according to 40 CFR 262.34(c) provisions.

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