

9461.1991(01)

RCRA/SUPERFUND HOTLINE MONTHLY SUMMARY

NOVEMBER 1991

2. Transfer Facility as Central Collection Point

A company generates small quantities of hazardous waste at several separate field locations. The company does generate more than 100 kilograms of hazardous waste per month at each separate field location. May the company use a transfer facility as a central collection point to consolidate waste from these field locations?

Yes. A company may consolidate waste from several locations or generation sites at a central point provided that certain requirements are met. First, each generation site must have an EPA Identification No. and meet all applicable requirements under 40 CFR Part 262. In addition, each shipment of hazardous waste must be accompanied by a hazardous waste manifest and the transporter must also have an EPA Identification No.

The transfer facility provision under §263.12 may be applied to a situation such as this one under the following conditions. According to §260.10, a transfer facility is defined as "any transportation-related facility including loading docks, parking areas, storage areas and other similar areas where shipments of hazardous waste are held during the normal course of transportation." The transfer facility is the place where transporters consolidate shipments or transfer shipments to different vehicles in order to redirect them; this activity usually takes place over a short period of time. (45 FR 86966; December 31, 1980) Section 263.12 allows a transporter to store manifested shipments of hazardous waste at a transfer facility for up to 10 days without obtaining a permit. During this time the hazardous waste must be held in containers which meet Department of Transportation (DOT) packaging requirements. As long as the central collection point meets the definition of a transfer facility, the company may use it to consolidate shipments of hazardous waste from different generation locations. Note that if a transporter mixes hazardous wastes of different DOT shipping descriptions, §263.10(c) requires compliance with 40 CFR Part 262, Standards Applicable to Generators of Hazardous Waste.