



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 cursive script that reads "Jessica Young".

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

RCRA/SUPERFUND HOTLINE MONTHLY REPORT

February 1999

1. Movement of Waste Between Satellite Accumulation Areas

Pursuant to 40 CFR Section 262.34(c), large quantity generators (LQGs) and small quantity generators (SQGs) are allowed to accumulate hazardous waste in satellite accumulation areas without complying with all of the generator accumulation provisions, or obtaining a RCRA permit or interim status. The satellite accumulation provisions allow LQGs and SQGs to accumulate hazardous waste in containers at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste. If a facility has multiple satellite accumulation areas, can an LQG or SQG move wastes from one satellite area to another satellite area?

An LQG or SQG cannot move wastes between satellite accumulation areas. Once a waste leaves a satellite accumulation area, the waste should be destined for an accumulation area which is fully regulated under Sections 262.34(a) or (d), or Parts 264 or 265. The regulatory requirements for satellite accumulation areas are designed to provide the generator with a safe and efficient manner to accumulate limited amounts of hazardous waste at or near the point of generation, prior to moving the waste to a fully regulated storage area. This eliminates the need to frequently move smaller quantities of hazardous waste within the generator's facility (49 FR 49569; December 20, 1984). It was not EPA's intent to allow hazardous wastes to be moved from one satellite accumulation area to another.

Furthermore, if waste is moved between satellite accumulation areas, this calls into question whether the waste is being stored in a satellite accumulation area "at or near the point of generation where wastes initially accumulate."