

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."