



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

RCRA, SUPERFUND & EPCRA HOTLINE MONTHLY REPORT
December 1999

1. Inspection of Satellite Accumulation Containers

A large quantity generator (LQG) that is accumulating hazardous waste on-site for 90 days or less in containers must comply with 40 CFR Part 265, Subpart I (§262.34(a)(1)(i)). Section 265.174 of Subpart I requires owners and operators to inspect containers weekly for leaks and deterioration caused by corrosion or other factors. Are LQGs required to inspect hazardous waste containers in satellite accumulation areas at or near the waste's point of generation in accordance with §262.34(c)?

Hazardous waste containers used to accumulate hazardous waste at or near any point of generation ("satellite accumulation") and in compliance with §262.34(c) are not required to be inspected weekly. A generator accumulating hazardous waste in satellite accumulation areas must comply with §§265.171, 265.172, and 265.173(a) (§262.34(c)(1)(i)). These requirements include that a LQG ensure that the containers are in good condition, that the waste is compatible with the containers, and that the containers are kept closed except when necessary to add or remove waste. In addition, if the container begins to leak the generator must transfer the waste to a container that is in good condition. Section 265.174, regarding weekly inspection, is not a requirement for containers of hazardous waste in a satellite accumulation area. Therefore, LQGs are not required to conduct a weekly inspection of containers in satellite accumulation areas so long as they comply with the provisions of §262.34(c). Authorized states may require weekly inspection of containers in satellite accumulation areas, as states may have more stringent requirements than the federal regulations.