

RCRA, SUPERFUND & EPCRA CALL CENTER MONTHLY REPORT
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1. Cabinets as Satellite Accumulation Areas

A large quantity generator may accumulate hazardous waste without obtaining a RCRA permit in containers at or near the point of generation provided he or she complies with the satellite accumulation standards in 40 CFR Section 262.34(c). These standards require that the containers be marked with the words "Hazardous Waste" or with other words that identify the contents of the container (§262.34(c)(1)(ii)). If the generator has a satellite accumulation area that is located inside a cabinet, does a hazardous waste label placed on the outside of the cabinet fulfill the marking requirement, or must each individual container within the cabinet be labeled?

Placing a label with the words "Hazardous Waste" on the outside of the cabinet may satisfy the satellite accumulation area marking requirements provided the cabinet meets the definition of container. A container is a portable device in which material is stored, transported, treated, disposed of, or otherwise handled (§260.10). As a satellite accumulation area, the cabinet would have to be located at or near the point of generation and be under control of the operator of the process where the wastes are initially generated. In addition, the generator would have to maintain the cabinet in accordance with the container standards. These standards require that the cabinet be in good condition, be made of materials compatible with the waste that would be stored in it, and must always be closed during storage except when waste is being added or removed (§262.34(c)(1)(i)). If the cabinet does not meet the definition of container and cannot be managed according to the applicable container standards, each individual container within the cabinet would need to be labeled and managed in accordance with all other satellite accumulation area requirements.