

Hazardous Waste Management & Minimization

SATELLITE ACCUMULATION

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Today's Session

- Brief Review of Hazardous Waste basics
- Managing Hazardous Waste at Satellite Accumulation Areas
- Brief Review of Central Storage
- Brief Review of record keeping
- Question & Answer

Generator Status

Based on amount of hazardous waste generated in a calendar month.

- Conditionally Exempt Small Quantity Generators
 - CESQG < 220 lbs./month
- Small Quantity Generators
 - SQG = 220 - 2,200 lbs./month
- Large Quantity Generators
 - LQG > 2,200 lbs./month
- Any facility generating >2.2 lbs. of acute waste in a calendar month is a Large Quantity Generator!!

Waste Criteria

Characteristic

Ignitable - D001
Corrosive - D002
Reactive - D003
Toxicity - D004 - 43

Listed

F - Solvents and non specific source wastes
P & U - Unused chemicals and products
K - Waste from specific industrial processes

Exempt

Materials that are Not solid waste
Solid wastes that are Not hazardous waste, scrap metal
Hazardous waste that is exempted from the rules

- Used Oil & Oil Filters
- Used Antifreeze
- Automotive Batteries
- Wipers and Rags when sent to a permitted laundry
- Universal Waste, Lamps
- Wastewater

Waste Determination

Information Sources for making a Determination

- Product Manufacturer
- SDS (MSDS) (account for information limitations)
- Process Knowledge
- Analytical data: TCLP
- Your state or local environmental business assistance program

Common Hazardous Waste

| Description of Waste | EPA Waste Code(s) |
|--|--|
| Spent cleaning or degreasing solvents (e.g., xylene, acetone, MEK, toluene, benzene, methanol) Still bottoms, solvent wipers | F003, F004, F005, D001, D018, D035 |
| Spent halogenated cleaning or degreasing solvents (e.g., methylene chloride, 1,1,1-trichloroethane, carbon tetrachloride, trichloroethylene). Still bottoms, solvent wipers | F001, F002, D019, D039, D040 |
| Old paint, paint booth filters | D001, D035, D006, D007, D008 |
| Mineral spirits or stoddard solvent, solvent wipers | D001 |
| Spent acids or caustics | D002 |
| Dry cleaning waste and filters | F001, F002, D019 |
| Printing wastes | D001, D002, D011 |
| Lab chemicals | D, F, P, U codes possible |
| Metal plating wastes | F007, F008, F009, F010, F011, F012, F019, D007, D008 |

QUESTIONS

Which generator status require EPA ID #?

Do exempt or excluded waste count towards the generator status?

Does the weight of the container count towards the generator status?

Satellite Accumulation

How to manage these areas and the waste
generated in them.

Satellite Accumulation

- Satellite accumulation regulations reside in 40 CFR 262.34(c)
 - “Satellite areas are those places where wastes are generated in the industrial process or laboratory and where those wastes must initially accumulate prior to removal to a central area”.
- Typically the generator identifies satellite accumulation by signage, roping, painted area, clipboard, etc.
- The daily volume counts towards the generator status.

Satellite Accumulation

- Accumulate up to 55 gallons hazardous waste or 1 quart acute hazardous waste *NEAR ANY POINT WHERE WASTES INITIALLY ACCUMULATE.*
 - At or near any point of generation, and
 - Under the control of an operator.
- Label container “**Hazardous Waste**” or other words that identify the content of the containers; NAC 444.8671 excludes these containers from the labeling requirement to include the hazardous Waste Code;

Satellite Accumulation

- Containers must be in good condition & compatible with the waste;
- Containers must be closed at all times when material is NOT being added or removed;
- Date the drum when the 55 gallons is exceeded;
- Containers are exempt from weekly container inspections.

- SQGs may co-locate Satellite Containers within Central Storage.
- LQGs must justify “At or Near the point of generation”, AND “Under the control of the process operator”
- BMP suggests secondary containment and static grounding protection.
- CESQG facilities are not subject to the satellite accumulation rule.
 - See 40 CFR 261.5

- **City of Sparks must use full HW labeling**

Three Day Rule

- Within 3 days of the container becoming full:
 - Date the label;
 - EPA Waste Code;
 - Transfer to central storage.
- The storage clock starts, 90/180/270 days when the container is moved to the central storage.
- Generators may not move satellite accumulation containers between satellite areas.

The CONFUSION!

- Waste located in the satellite accumulation **MUST** be counted towards the **MONTHLY GENERATOR STATUS** of the facility. Therefore, it is imperative to track the volume of waste at the satellite accumulation locations.
 - If the container is dated when you first place HW into it, then it could be considered a central storage area, not a **SATELLITE**;
 - The volume in the container cannot be ‘averaged’;
- **3-days to move a full 55-gallon container!!!! WARNING!**
 - Date the drum on the day it becomes full;
 - 3-days to move it to an accumulation area, permitted storage, permit-exempt unit (recycling), onsite permitted treatment, or offsite;
- **THE POTENTIAL VIOLATION = MORE THAN 55-GALLONS!!!**

The CONFUSION! continues

- There can be more than one (1) container at the satellite location. The total volume is limited not the number of containers. The max is 55 gallon or 1 quart of acute hazardous waste.
- A facility can have multiple satellite accumulation areas. WARNING! DUPLICATE areas require justification;
- Can't move waste between satellite areas, HOWEVER, a single AREA can have multiple points of generation.

QUESTIONS

How much waste can a CESQG generate at the satellite area and remain a CESQG?

Does the satellite area container need an initial date when hazardous waste is placed into the satellite container?

Are satellite areas subject to weekly container inspections? Explain.

Central Accumulation Area

- Proper handling
- Access control
- Secondary Containment
- Waste segregation - Incompatible wastes
- Protection from the weather
- Weekly Inspections: NO MORE than 7-days between inspections.
- Spark protection

Central Storage Container Inspections

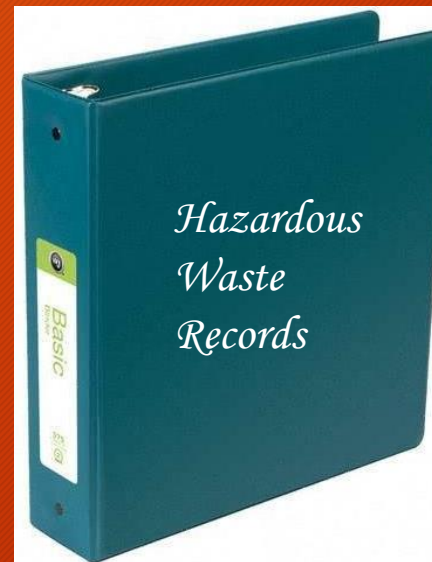
- SQG & LQG required to inspect the hazardous waste storage area weekly.
- *Inspections cannot occur more than 7 days apart!*
- Inspection form must note:
 - Date and Time of Inspection;
 - Name of Inspector (signature);
 - Observations made;
 - Date and Time of any corrective actions.
- Maintain written records of inspections for at least 3 years.

Disposal Matrix

| Category | Generation Limit | Storage Time | Storage Quantity | Requirements if Limits(s) are Exceeded |
|--|---|---|---|--|
| Conditionally-Exempt Small Quantity Generator (CESQG) | <100 kg/mo (less than 220 lbs.) of Hazardous Waste. | None. | 1,000 kg (2,200 lbs.) of Hazardous Waste. | <ul style="list-style-type: none"> * If generator exceeds generation limits, waste is subject to LQG or SQG requirements depending upon amount exceeded. * If generator exceeds storage quantity limits, waste is subject to SQG requirements. |
| | <1kg/mo (2.2 lbs.) of acute Hazardous Waste. | None. | 1 kg (2.2 lbs) of acute Hazardous Waste. | |
| Small Quantity Generator (SQG) | 100 to 1,000 kg/mo (220-2,200 lbs) of Hazardous Waste. | 180 Days (or 270 days if waste must be shipped over 200 miles). | 6,000 kg/mo (13,200 lbs.) of Hazardous Waste. | <ul style="list-style-type: none"> * If generator exceeds generation limits, waste is subject to LQG requirements. * If generator exceeds storage time or quantity limits. Facility is subject to storage facility (TSDF) requirements. |
| | <1kg/mo (2.2 lbs.) of acute Hazardous Waste. | | 1 kg (2.2 lbs) of acute Hazardous Waste. | |
| Large Quantity Generator (LQG) | >1,000 kg/mo (2,200 lbs.) of Hazardous Waste. <hr/> >1kg/mo (2.2 lbs) of acute Hazardous Waste. | 90 Days. | None. | *If generator exceed time limits. Facility is subject to storage facility (TSDF) requirements. |

Recordkeeping Review

- Operational Records
 - EPA ID Number
 - Waste Determination
 - Training Records
 - Inspection Records
- Waste Disposal Records
 - Manifests
 - Land Disposal Restrictions
 - Tolling Agreements
- Preparedness and Prevention Records
 - Preparedness and Prevention Plan
 - Contingency Plan
 - Required Postings



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NEVADA | BUSINESS ENVIRONMENTAL PROGRAM

- Free and Confidential
- Hazardous Waste and Pollution Prevention Assistance
- Phone, email and on-site assistance
- Fact Sheet Publications
- Seminars and Group Presentations
- Energy Efficiency Assistance
- Funding provided by Nevada Division of Environmental Protection and Federal EPA

Assistance Line (800) 882-3233

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