

EPA530-R-03-002f

RCRA, SUPERFUND & EPCRA CALL CENTER MONTHLY REPORT

June 2003

1. Start Dates on Large Quantity Generator Tanks

A large quantity generator (LQG) accumulates hazardous waste in both tanks and containers. The generator labeled each container with the date upon which the accumulation period began in accordance with 40 CFR Section 262.34(a)(2). Must this LQG also mark the accumulation start date on tanks that are used to accumulate hazardous waste?

The LQG must also mark hazardous waste accumulation tanks with the date upon which the hazardous waste accumulation period begins. Although this requirement is not cited in Section 262.34(a)(2), EPA intended for both tanks and containers to be marked with accumulation start dates (51 FR 10146, 10160; March 24, 1986). This requirement ensures that LQGs accumulate hazardous waste in accordance with the 90-day accumulation time limit.

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