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## RCRA/SUPERFUND HOTLINE MONTHLY SUMMARY

APRIL 86

### 2. Small Quantity Generator Accumulation

On March 24, 1985, EPA promulgated regulations allowing a generator to operate two distinct on-site accumulation areas for wastes generated at different monthly rates (51 FR 1014).

A generator has two accumulation areas on-site. In one area, the generator stores waste identified as small quantity generator (SQG) waste. According to §262.34(d), an SQG that generates between 100 and 1000 kg. in a calendar month may store this waste on-site for up to 180 days without a permit or interim status provided that the quantity of waste accumulated never exceeds 6000 kg. The SQG waste can be stored for 270 days if it is transported 200 miles or more.

In another area at the same site, the generator stores large quantity generator (LQG) waste which was produced during the months the generator exceeded the 1000 kg/month limit. A LQG may store this waste on-site for up to 90 days without a permit or interim status. Must the generator count waste stored in his LQG accumulation area when determining if the 6000 kg. accumulation limit is exceeded in (§262.34(d)(1))?

Section 262.34(d) states that a generator who generates greater than 100 kg. but less than 1000 kg. of hazardous waste in a calendar month may accumulate hazardous waste on-site for 180 days or less without a permit or interim status provided that, among other requirements, the quantity of waste accumulated on-site never exceeds 6000 kg. This provision applies only to waste streams produced during calendar months when less than 1000 kg is generated. If more than 1000 kg is generated, it is fully regulated as large quantity generator waste. The 6000 kg cap for the SQG waste stream applies to all waste accumulated on-site. "On-site" means all contiguous property (§260.10). The definition does not refer to "units" or "accumulation areas". Therefore, the generator must count all waste, including both SQG and LQG that is on-site, in order to determine compliance with §262.34(d)(1).

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