

9453.1989(03)

RCRA/SUPERFUND HOTLINE MONTHLY SUMMARY

AUGUST 89

2. Generator Satellite Accumulation/Counting Requirements

A generator accumulates hazardous waste in a satellite accumulation area pursuant to 40 CFR Section 262.34(c) standards. The generator also generates other RCRA hazardous waste elsewhere on-site. When determining generator status, must a generator count the waste collecting in the satellite accumulation area or count it once it enters the generator storage area?

To determine their generator status, generators must count all hazardous waste generated at their facility in a calendar month. Wastes not included in the monthly determination are identified in Section 261.5(c). These are wastes either not subject to regulation or subject to only the notification and reporting requirements in Sections 262.11, 262.12, 262.40(c) and 262.41. Wastes stored in the satellite accumulation area are subject to certain container standards (e.g., Sections 265.171, 265.172, and 265.173(a)). These regulations are not among those listed in 261.5(c). Therefore, wastes in the satellite accumulation must be included in the generator's monthly waste quantity determination.

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