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# Satellite Waste Management

Presented by:

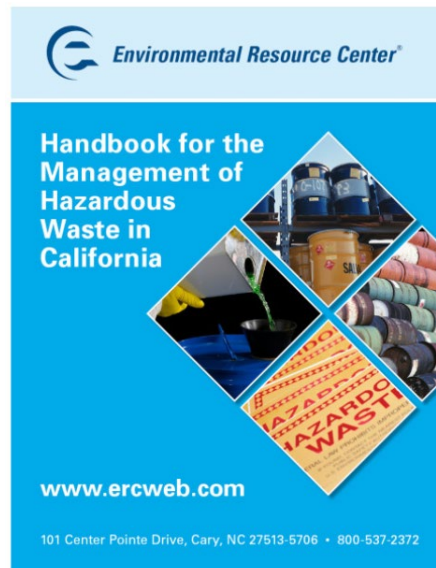


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# Introduction

- Regan Bottomley
  - [rbottomley@ercweb.com](mailto:rbottomley@ercweb.com)
- Andy Smith
  - [asmith@ercweb.com](mailto:asmith@ercweb.com)
- Answerline™ for one year
- Regs of the Day™
- Tips of the Week™
- Book Updates



# Objectives

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- “Define” what a satellite area is
- Identify rules for managing satellite waste
- Understand definitions versus interpretations
- Identify the HWGIR that must/may be adopted

# In the Beginning.....

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- Satellite rules didn't exist
  - Only 90-day and CESQG rules prior to 1984
  - EPA presumed waste was stored in "one or two discrete locations"

# In the Beginning.....

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- The regulated community pointed out that there may be dozens of places where hazardous wastes are initially generated and collected during daily operations

# In the Beginning.....

- Original regulations made no distinction between initial point of generation (“satellite”) and the central storage area where wastes are consolidated for on-site management or transportation off site



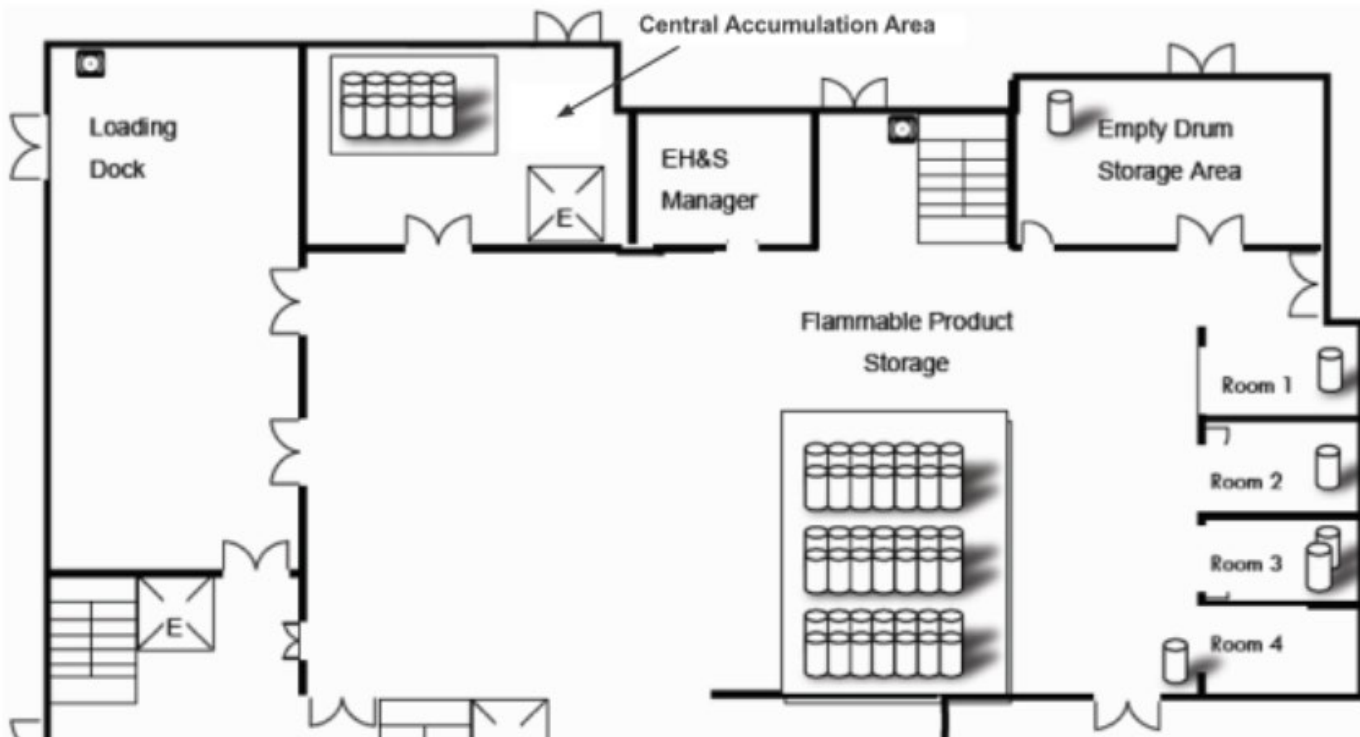
# The Satellite Area

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- “Those places where wastes are generated in the industrial process or the laboratory and where those wastes must initially accumulate prior to removal to a central area.”
- No limit on the number of satellite areas on site



# Satellite vs. Central Accumulation



# The Satellite Area

- At or near any point of generation
- Where waste initially accumulates
- Under control of operator



22 CCR 66262.34(e)(1)

# “At or Near,” “Where Waste Initially Accumulates”

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- Not defined
- So how near is “near?”

# Moving Satellite Waste

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- Satellite waste may not be moved to another satellite area
  - No longer at or near point of generation or initial accumulation
  - Consolidation is permissible within a satellite area

# Under the Control of the Operator

HWGIR

- “EPA has not defined this term in the regulations, has not discussed it in preamble and discussed it only minimally in guidance letters.”
- *“The Agency deliberately did not propose any regulatory text to define the term ‘under the control of the operator.’”*

# Intention of the Rule

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- “The goal is that this temporary accumulation is performed responsibly and safely, with adequate oversight and control.”

# Under the Control of the Operator

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HWGIR

- Controlled access to an area, building, room, or cabinet
  - Access via key, lock box, access card

# Let's Consider.....





# Pop Quiz

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- Does waste in the satellite area count towards generator status?
  - Yes
  - No

# Satellite Accumulation



- Quantity limits
  - 55 gallons non-acute
  - 1 quart acute/extreme
  - 1 kilogram
  
- No limit on amount or type of containers



# Why 55 Gallons?

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- Does not pose a significant threat
- Easy to control and clean up
- Widespread use of 55-gallon containers



# Pop Quiz

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- What does the 55-gallon limit apply to?
  - Process or group of processes
  - Waste stream
  - Room/area
  - Site

**▲ DANGER**  
HAZARDOUS WASTE  
**Paint**  
All Containers Must Be  
GROUNDING

**▲ DANGER**  
HAZARDOUS WASTE  
**Solids / Filters**  
All Containers Must Be  
GROUNDING

**▲ DANGER**  
HAZARDOUS WASTE  
**Solvents**  
All Containers Must Be  
GROUNDING

**▲ DANGER**  
HAZARDOUS WASTE  
**Solids - Filters**  
Keep for Later and  
at all times

PAINT

HAZARDOUS WASTE

Flammable Liquid

Red funnel on top.

PAINT

HAZARDOUS WASTE

Flammable Solid

Green barrel with a black lid and a padlock.

SKIN, VENT  
TOXIC

HAZARDOUS WASTE

Flammable Liquid

Red funnel on top.

# The 55-Gallon (or 1 qt/kg) Limit

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- A process or group of processes, unless.....
  - **Incompatible**
  - **Impractical** (e.g., prevents recycling or requires unreasonable procedures)
  - **Unsafe** (from an environmental or worker/public health standpoint)
- Subject to review and approval

# The Three “Cs” for Satellite Containers

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- Containers must be
  - **Condition**
  - **Compatible**
  - **Closed**



# Condition

- If a container is not in good condition
  - Transfer to good container
  - Manage under more stringent rules (e.g., 90-day rules)





# Compatible

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- Container made of, or lined with, materials that will not react with, and are otherwise compatible with, the hazardous waste



# Compatible



- New Federal additions for compatibles
  - Do not place in same container
  - Do not place in unwashed container



# Compatible



- Containerized waste that is incompatible with any waste or other material accumulated nearby
  - Separated
  - Protected



# Closed

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- Closed except when necessary
  - Add
  - Remove
  
- “Tip test?”



# Closed

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HWGIR

- Closed except when necessary
  - Consolidate
  - Vent
    1. Proper operation of equipment or
    2. Prevent dangerous situations

# Satellite Markings

- "Hazardous Waste"
- Accumulation start date
- Composition and physical state
- Indication of the hazards
- Generator's name and address



# Markings

- “The date is clearly marked and visible for inspection”

**HAZARDOUS  
WASTE**

**STATE AND FEDERAL LAW PROHIBITS IMPROPER DISPOSAL**

IF FOUND, CONTACT THE NEAREST POLICE, OR PUBLIC SAFETY  
AUTHORITY, OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY OR  
THE CALIFORNIA DEPARTMENT OF TOXIC SUBSTANCES CONTROL.

GENERATOR INFORMATION:

NAME \_\_\_\_\_

ADDRESS \_\_\_\_\_ PHONE \_\_\_\_\_

CITY \_\_\_\_\_ STATE \_\_\_\_\_ ZIP \_\_\_\_\_

EPA IDENTIFICATION NO. / MANIFEST TRACKING NO. \_\_\_\_\_ / \_\_\_\_\_

EPA WASTE NO. \_\_\_\_\_ CA WASTE NO. \_\_\_\_\_ ACCUMULATION START DATE \_\_\_\_\_

CONTENTS, COMPOSITION: \_\_\_\_\_

PHYSICAL STATE:      HAZARDOUS PROPERTIES:     FLAMMABLE     TOXIC

SOLID     LIQUID     CORROSIVE     REACTIVITY     OTHER \_\_\_\_\_

[ \_\_\_\_\_ ]

D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX

**HANDLE WITH CARE!**

# CA Version

<b>HAZARDOUS WASTE</b>	
<b>STATE AND FEDERAL LAW PROHIBITS IMPROPER DISPOSAL</b>	
IF FOUND, CONTACT THE NEAREST POLICE, OR PUBLIC SAFETY AUTHORITY, OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY OR THE CALIFORNIA DEPARTMENT OF TOXIC SUBSTANCES CONTROL.	
GENERATOR INFORMATION:	
NAME _____	
ADDRESS _____	PHONE _____
CITY _____	STATE _____ ZIP _____
EPA IDENTIFICATION NO. / MANIFEST TRACKING NO. _____	
EPA WASTE NO. _____	CA WASTE NO. _____
	ACCUMULATION START DATE _____
CONTENTS, COMPOSITION: _____	
PHYSICAL STATE: <input type="checkbox"/> SOLID <input type="checkbox"/> LIQUID	HAZARDOUS PROPERTIES: <input type="checkbox"/> FLAMMABLE <input type="checkbox"/> TOXIC <input type="checkbox"/> CORROSIVE <input type="checkbox"/> REACTIVITY <input type="checkbox"/> OTHER _____
<div style="border: 1px solid black; padding: 5px; margin: 5px auto; width: 80%;">           D.O.T. PROPER SHIPPING NAME AND UN OR NA NO, WITH PREFIX         </div>	
<b>HANDLE WITH CARE!</b>	

<b>HAZARDOUS WASTE</b>	
<b>STATE AND FEDERAL LAW PROHIBITS IMPROPER DISPOSAL</b>	
IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY AUTHORITY, THE U.S. ENVIRONMENTAL PROTECTION AGENCY OR THE CALIFORNIA DEPARTMENT OF TOXIC SUBSTANCES CONTROL.	
ACCUMULATION START DATE _____	EPA WASTE NO. _____
	CA WASTE NO. _____
HAZARDOUS CHARACTERISTICS: <input type="checkbox"/> IGNITABLE <input type="checkbox"/> TOXIC <input type="checkbox"/> CORROSIVE <input type="checkbox"/> REACTIVE	
GENERATOR'S NAME _____	
ADDRESS _____	
CITY _____	STATE _____
EPA ID. NO. _____	MANIFEST TRACKING NO. _____
COMPOSITION AND PHYSICAL STATE _____	
DOT PROPER SHIPPING NAME _____	
DOT IDENTIFICATION NUMBER _____	
<small>(Must fill the height of the box to comply with §172.301.)</small>	
<b>HAZARDOUS WASTE - HANDLE WITH CARE</b>	









# Reaching Quantity Limits

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- Upon reaching quantity limits
  - Mark the date
  - Second date



22 CCR 66262.34(e)(3)

# What Does That Mean?

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- Date indicates
  - Beginning of the 90/180 days
  - Three days to comply with
    - 90-day (LQG) rules
    - 180-day (SQG) rules
    - Ship off site

# Pop Quiz

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- Is it 3 days or 72 hours?

# Three Days - Federal

HWGIR

- 3 days – Not 72 hours
- Originally proposed 72 hours, but.....

“.....The EPA is changigng the time requirement from 72 hours to three days. The added precision of both date and time of day is unnecessary and this change lessens the additional burden imposed by the labeling requirement”

# Pop Quiz

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- What does 'day' actually mean?
  - Working days
  - Calendar days
  - Business days
  - Only days I show up to work?



# Federal

FEBRUARY						
Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
				1	2	3
4	5	6	7	8	9	10
11	12	13	14	15	16	17
18	19	20	21	22	23	24
25	26	27	28			

Reach 55  
gallons

Presidents  
day



# Federal

FEBRUARY						
Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
				1	2	3
4	5	6	7	8	9	10
11	12	13	14	15	16	17
18	19	20	21	22	23	24
25	26	27	28			

Reach 55 gallons

Move it!  
Presidents day



# Three Days - California

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- “Periods of time are calculated by excluding the first day and including the last. Except, if the last day is a Saturday, Sunday or other holiday specified in Government Code section 6700 it is also excluded.”

# California

FEBRUARY						
Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
				1	2	3
4	5	6	7	8	9	10
11	12	13	14	15	16	17
18	19	20	21	22	23	24
25	26	27	28			

Reach 55  
gallons

Presidents  
day



# California

FEBRUARY						
Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
				1	2	3
4	5	6	7	8	9	10
11	12	13	14	15	16	17
18	19	20	21	22	23	24
25	26	27	28			

Reach 55  
gallons

Presidents  
day

Move  
it!



# Accumulation Time Limits

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- Generators may not hold waste on site for more than 1 year, or 90/180 days, *whichever occurs first*

# Pop Quiz

## 90-Day Generator

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Satellite start date



Reach 55-gallon  
date



Ship off site date



# Pop Quiz

## 90-Day Generator

---

Satellite start date



Reach 55-gallon  
date



Ship off site date





# Pop Quiz

## 90-Day Generator

---

Satellite start date



Reach 55-gallon  
date



Ship off site date



# Pop Quiz

## 90-Day Generator

---

Satellite start date



Reach 55-gallon  
date



Ship off site date



# Pop Quiz

## 90-Day Generator

---

Satellite start date



Ship off site date



# Pop Quiz

## 90-Day Generator

---

Satellite start date



Ship off site date



# Training?

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“EPA believes, however, that since only one waste will normally be accumulated at each satellite area, and since only limited quantities are allowed to accumulate..... training plans are not necessary.”

- Passed concurrently with OSHA training standards

# Training?

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- Business plan training
  - Emergency response and safety
  - All new employees
  - Annual training

# Inspections?

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- Not required
- EPA believed “under the control of an operator” and the container rules would, in essence, be equivalent

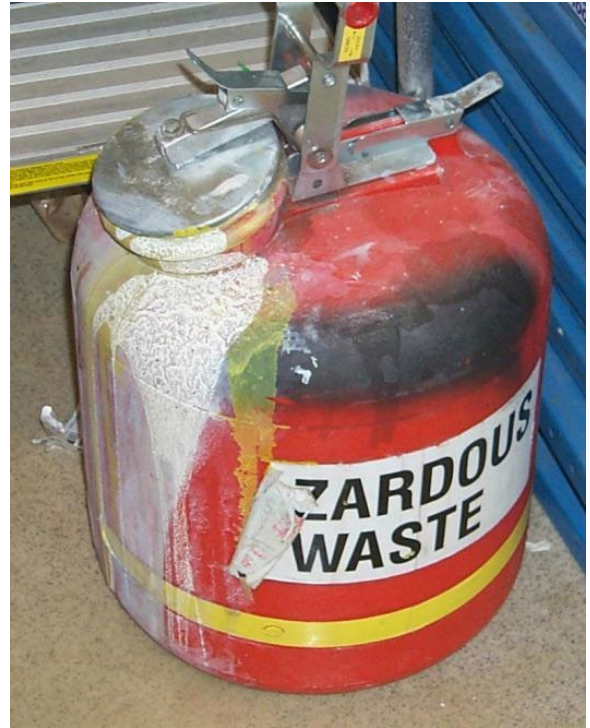
# Secondary Containment?

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- Not required
- Reasons you may voluntarily have it
  - CWA
  - SPCC
  - Good management practice
  - Corporate insurance
  - Local codes











# Emergency Preparedness and Prevention

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- Historically, satellite areas excluded
- HWGIR added requirements for emergency preparedness, prevention and procedures
- “Anywhere hazardous waste is either generated or accumulated”

# Emergency Preparedness and Prevention

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- Satellite areas are now subject to
  - Required equipment
  - Testing and maintenance of equipment
  - Access to communications
  - Required aisle space
  - Arrangements with authorities
  - Emergency procedures

# HWGIR Changes to Satellite

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- \* 1. Special requirements for incompatibles
- 2. Flexibility for “closed”
- \* 3. “Consecutive calendar days”
- 4. Added kilogram for acute
- 5. Clarified what happens upon reaching 55 gallons
- 6. Changed marking requirements

\* = More Stringent

# HWGIR Changes to Satellite

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- \* 7. Added preparedness and prevention requirements
- \* 8. Added “immediately” regarding moving container if it is leaking or damaged
- 9. Cleaned up regulatory language (e.g. generators may use satellite, what regulations do not apply)

\* = More Stringent

# Thank You

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➤ Regan Bottomley

➤ Andy Smith

[rbottomley@ercweb.com](mailto:rbottomley@ercweb.com)

[asmith@ercweb.com](mailto:asmith@ercweb.com)

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