



**Missouri
Department of
Natural Resources**

Satellite Accumulation Issues

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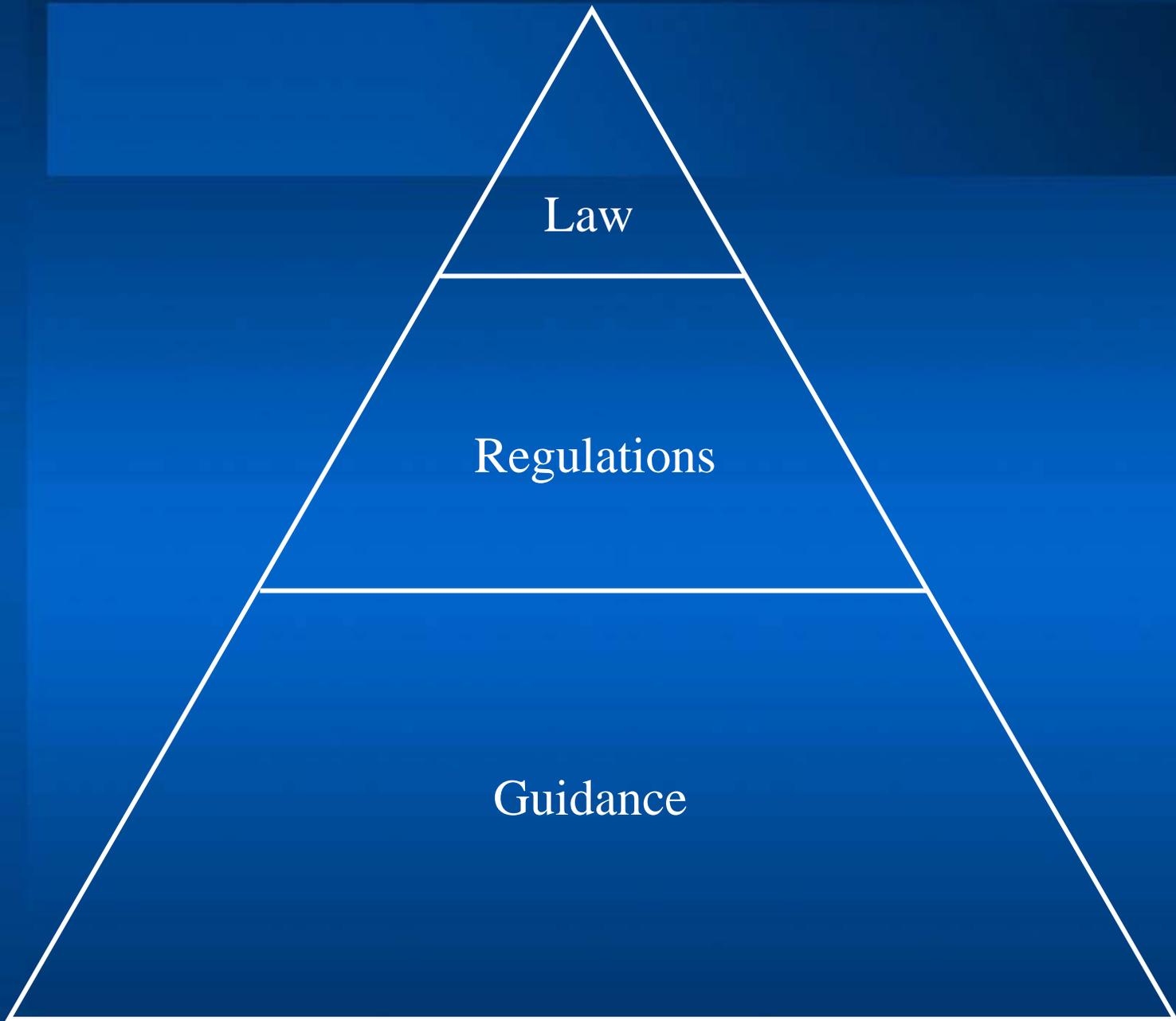


Regulatory Interpretation in Question

Quantities accumulated not exceeding
55 gallons (1 quart of acutely hazardous
waste) - 10 CSR 25-5.262(1) incorporating
40 CFR 262.34(c)1

Stakeholder Request

- Amend Missouri interpretation to treat all satellite accumulation with federal interpretation OR
- Go through regulatory process to amend the CSR, OR
- Notify EPA of this policy change per the procedures in 40 CFR 271



Law

Regulations

Guidance

Why Use Satellite Accumulation?

- Some areas/processes generate waste slowly, taking more than 90/180 days to accumulate 55 gallons.
- Sites that have many separate locations generate waste frequently.
- It is inefficient either for the operator to immediately bring the waste to a central accumulation area.

Why Use Satellite Accumulation?

- The facility may not want to maintain numerous separate 90/180 day accumulation areas.

Satellite Container Accumulation Requirements

- Containers must be:
 - Containers (portable devices).
 - In good condition (DOT approved container not required).
 - Located at or near the point of generation where waste initially accumulates.
 - Under the control of the operator of the process which generates the waste.
 - Kept closed except when adding or removing waste.
 - Marked “Hazardous Waste” or with other words that identify contents.
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Satellite Container Accumulation Requirements

- Containers must:
 - Contain waste that is compatible with the container.
 - Be marked with the date that waste first accumulates.
 - Be moved to the 90/180 day storage area or shipped directly offsite within 3 days of filling.
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Satellite Container Accumulation Requirements

- Only one container allowed per waste stream, maximum of 55 gallons per waste stream (item 13 on Stakeholder Worklist)
 - Waste may only be accumulated up to one year, or when the container becomes full, whichever occurs first (item 4 on Stakeholder Worklist).
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Other Satellite Accumulation Requirements

- Satellite containers may not hold more than 55 gallons of non-acute or more than 1 quart of acute hazardous waste.
 - Waste must not be moved from one satellite area to another.
 - Large Quantity Generators must train satellite accumulation operators.
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Exemptions and Allowances

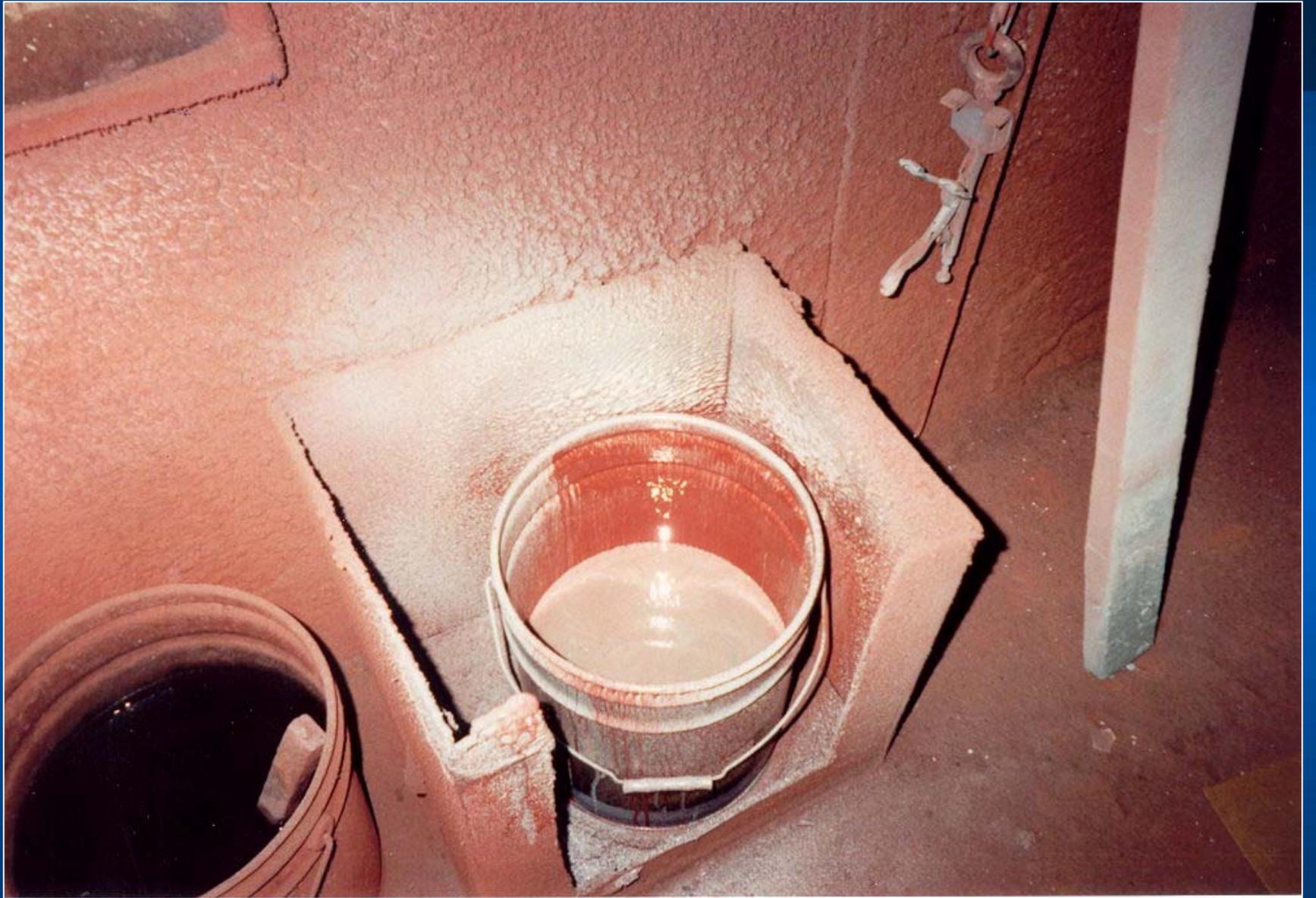
- The number of satellite areas is not restricted at a site.
 - Satellite accumulation areas are exempt from air emission standards (Subpart CC).
 - Containers that are emptied daily (within 24 hours) are not considered satellite accumulation containers.
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Exemptions and Allowances

- Continuous feed containers attached to process equipment are satellite accumulation containers.
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References

- DNR Fact Sheet on “Hazardous Waste Satellite Accumulation”
www.dnr.mo.gov/pubs/pub2215.pdf
- DNR Listserv for Hazardous Waste Generators - Archive
www.dnr.mo.gov/env/hwp/enf/SatAccum.htm
- EPA Memo on Satellite Accumulation
www.epa.gov/osw/specials/labwaste/memo-saa.htm

Discussion

- Only one container allowed per waste stream, maximum of 55 gallons per waste stream (item 13 on Stakeholder Worklist).
- Waste may only be accumulated up to one year, or when the container becomes full, whichever occurs first (item 4 on Stakeholder Worklist).