

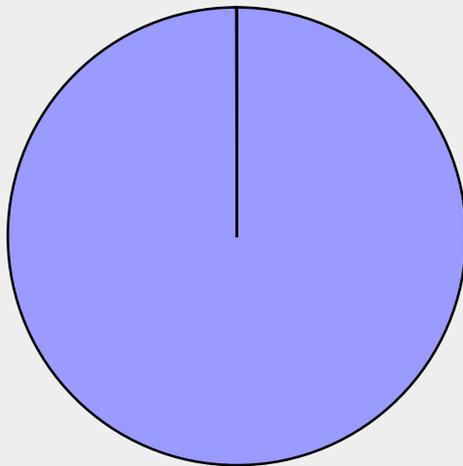


## Hazardous Waste Forum Survey - Small Quantity Generator Responses

Which category of hazardous waste generator are you?

| Answer Options                 | Response Percent | Response Count |
|--------------------------------|------------------|----------------|
| Small Quantity Generator (SQG) | 100.0%           | 110            |
| Large Quantity Generator (LQG) | 0.0%             | 0              |
| Other (please describe)        | 0.0%             | 0              |
| <i>answered question</i>       |                  | <b>110</b>     |
| <i>skipped question</i>        |                  | <b>0</b>       |

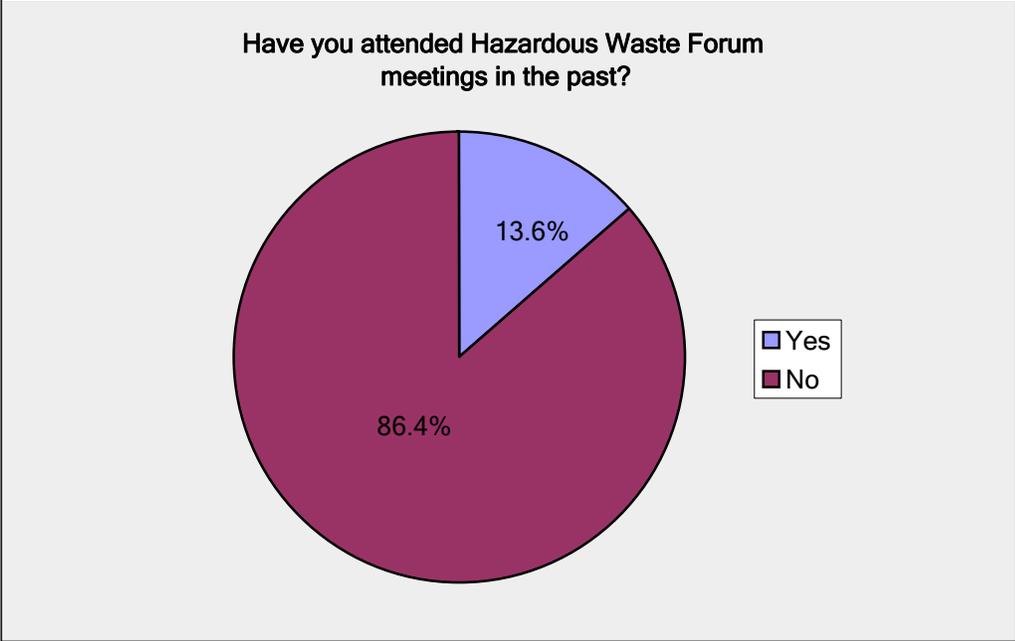
Hazardous Waste Forum Survey



- Small Quantity Generator (SQG)
- Large Quantity Generator (LQG)
- Other (please describe)

**Hazardous Waste Forum Survey - Small Quantity Generator Responses**

| Have you attended Hazardous Waste Forum meetings in the past?         |                  |                |
|---|------------------|----------------|
| Answer Options  | Response Percent | Response Count |
| Yes   | 13.6%            | 15             |
| No  | 86.4%            | 95             |
| If no, why and what would help you consider attending these meetings? |                  | 68             |
| <i>answered question</i>  |                  | <b>110</b>     |
| <i>skipped question</i>   |                  | <b>0</b>       |



| Number | If no, why and what would help you consider attending these meetings?   |
|--------|---|
| 1      | travel budget is very limited<br>I do not feel that the HWP is ready to sit down and have a meaningful discussion with regulated industry. I think that the |
| 2      | forums are just a show  |
| 3      | location, and advance notice  |
| 4      | Location<br>Not sure topics were relevant to our processes. Time away from work is not  |
| 5      | always possible   |
| 6      | Location, timing<br>conflicts in schedules (not enough lead time  |
| 7      | to make the plans to attend)<br>Travel time and being the sole person   |
| 8      | responsible for two sites.  |

## Hazardous Waste Forum Survey - Small Quantity Generator Responses

We are a small business and finding the time to attend is very difficult, because we don't have an abundance of people to allow  
**9** for me to get away.

We have very limited haz waste so it is not  
**10** a significant effort or concern for us.

My schedule normally prohibits me  
**11** attending

This is the first communication on this that I have noticed. Advanced notice of at least  
**12** 30 days.

**13** Current workload prevents extra activities

**14** Yes, if held in St. Louis

Logistics, time availability - Consider

**15** Kansas City sessions

We generate a small amount every couple  
**16** of years. It isn't a big thing for us.

**17** timing hasn't been right in the past

**18** was not previously aware of meeting

**19** Training sessions

Closer to my area such as Springfield or the  
**20** Lake

Travel costs - our company has cut travel budgets, so attending meetings like these, which would be beneficial to me, is not  
**21** seen as beneficial for the entire site.

I have no knowledge of these meeting. If I  
**22** were notified I might try to attend.

**23** Little advanced notice

**24** Most have been too far a distance to travel.

Like most other small companies we have a small staff and we all perform multiple functions. As such it is difficult for us to budget additional hours away from the

**25** office.

being able to learn something I don't

**26** already know

**27** never knew about them

**28** Have never been invited.

I am located in our corporate office in

**29** another state

**30** agencies have not deemed it necessary

**31** Just notification

**32** Not clear on purpose; requires travel

**33** I was unaware of the time and location.

Travel time and cost, plus time away from

**34** work

**35** This is the first invite

## Hazardous Waste Forum Survey - Small Quantity Generator Responses

- 36 more advance notice
- 37 On line meeting
- 38 Finding time is a problem  
I'm out of state and need enough time to
- 39 schedule the trip.
- Was not aware of the meetings. Would
- 40 attend if required by the Department of VA.  
Did not know it was a requirement.  
Direction from upper Management to
- 41 attend.  
Never heard of them. Prior notice of  
meeting dates and times. Preferably in the
- 42 KC Metro area.  
I would appreciate knowing the date of the
- 43 meetings earlier.
- 44 Not invited
- 45 I'm new to Missouri
- 46 Did not know about the meetings until now.
- 47 Was not aware of dates.  
Workload is too heavy and can't afford to be
- 48 away from the office.  
Too far away. Would attend if local, and
- 49 given timely notice.  
I have a professional firm that comes in and  
removes my waste according to EPA
- 50 regulations.  
only person here to write estimates.  
Webinar I would have a better chance of
- 51 attending  
HQ's located in Indianapolis & travel
- 52 options are limited.
- The DNR does not convey the message
- 53 that they are there to help, just to fine you.  
More advanced notice as we are based in
- 54 Indianapolis.  
Job requirements are met by corporate
- 55 SOP's
- 56 Have not been invited in the past.
- 57 No substitutive issues with SQG rules  
have not been aware of any; info on new
- 58 state requirements
- 59 Was not aware of when meeting was.
- 60 ED MITCHEM DID YEARS AGO. OTHER  
Was unaware of meetings. Location and  
schedule would assist in planning for
- 61 attendance.

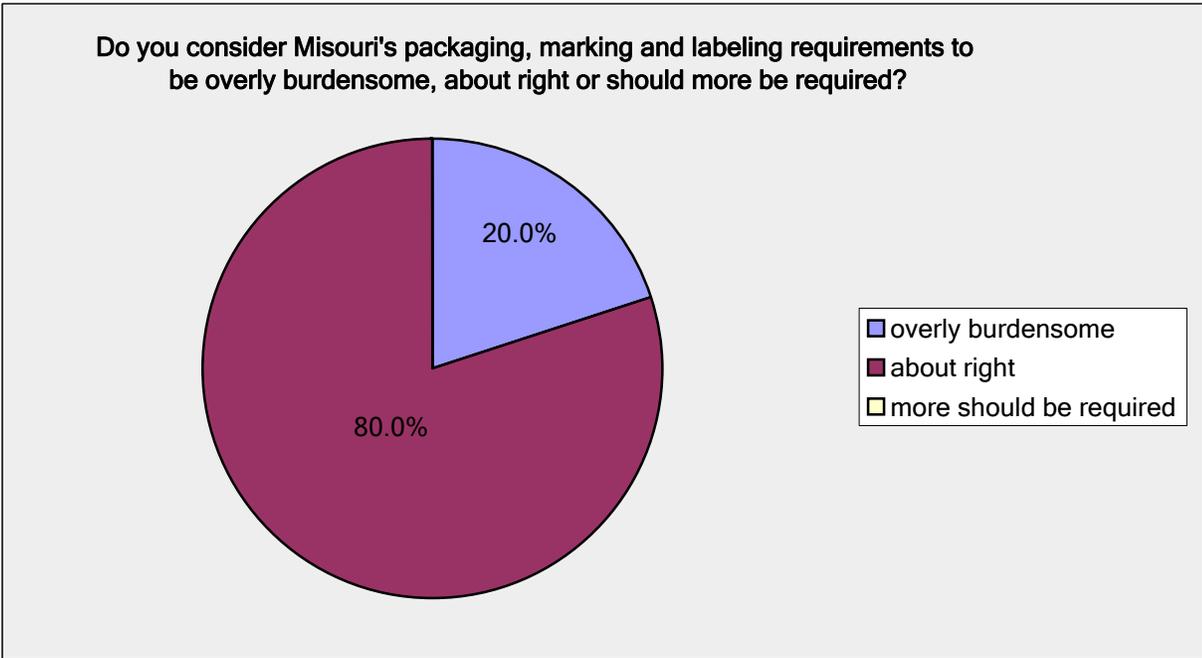
**Hazardous Waste Forum Survey - Small Quantity Generator Responses**

- Time in which they are offered are not always convenient, would be more able to use if could access information session at
- 62 convenience
  - 63 Was not aware of the forum meetings
  - We produce a very small amount. It is not
  - 64 economical to attend.
  - Consider holding them regionally to hold
  - 65 down time and travel expenses.
  - 66 Time and place are inconvenient
  - 67 Just simply too busy
  - 68 I was unaware of them

### Hazardous Waste Forum Survey - Small Quantity Generator Responses

Do you consider Missouri's packaging, marking and labeling requirements to be overly burdensome, about right or should more be required?

| Answer Options           | Response Percent | Response Count |
|--------------------------|------------------|----------------|
| overly burdensome        | 20.0%            | 22             |
| about right              | 80.0%            | 88             |
| more should be required  | 0.0%             | 0              |
| <i>answered question</i> |                  | <b>110</b>     |
| <i>skipped question</i>  |                  | <b>0</b>       |



## Hazardous Waste Forum Survey - Small Quantity Generator Responses

If overly burdensome, how do you suggest that safety information could be visually conveyed in a simple and reliable manner?

| Answer Options           | Response Count |
|--------------------------|----------------|
|                          | 20             |
| <i>answered question</i> | 20             |
| <i>skipped question</i>  | 90             |

| Number | Response Text   |
|--------|---|
| 1      | <p>Most containers are already marked identifying the contents, usually from satellite accumulation areas.</p>  |
| 2      | <p>As a generator of lab-scale, primarily labpack waste quantities, this requirement forces generators to package and seal labpacks prior to being filled. While the DOT diamond is the best marking to visually convey safety information, other DOT markings/labelings, and the requirement to be transport-ready (i.e. a sealed outer lab-pack container of a combination package), is unnecessary and burdensome if the inner package can be closed adequately.</p>   |
| 3      | <p>Labeling is not an issue. By complying with this, it also complies with OSHA hazcom labeling. So we feel that labeling once at the point of generation actually saves time.[]<br/>[]<br/>RE: packaged per dot; []<br/>We struggle with this. The vast majority of our waste is destined for lab pack. Our contractor along with trained employees segregate wastes for labpack the day of shipment. This ensures that we agree on compatibility issues.[]<br/>[]<br/>As long as the "inner" pkg is in compliance, the reg would be more easily applied if it were, "packaged, marked and labeled per DOT before offering for transportation. And while in storage, the primary (intended inner) container shall be in compliance with DOT combination pkg requirements while in storage.</p> |

## Hazardous Waste Forum Survey - Small Quantity Generator Responses

our primary waste stream is an alcohol  
xyele mixture--sat labeling is always a  
4 problem

Require makring of HAZARDOUS WASTE,  
NAME AND START ACCUMULATION  
5 DATE. or full DOT info as optional.

A general label stating what it is - but not  
require the DOT labeling piece. To be  
compliant, our facility buys labels and fills  
them out per regs, then our hazardous  
waste company brings THEIR labels (so  
they know things are labeled correctly  
before being placed on the truck for  
transport) - so our label (and time) is  
essentially wasted and all of this also costs  
money. The other issue we have run into in  
the past is having a mixture of waste that  
we get tested because we really have no  
idea how it should be labeled per DOT, so I  
risk "improper labeling" while waiting on  
test results to come back even though I  
have it clearly marked as Haz waste and  
the mixture of items in there as well as the  
6 start date.

Label container with what the product  
contains. Why on earth would you need to  
have additional labeling? if people are so  
worried about how emergency responders  
will respond to it, maybe we should just  
7 store it at the fire dept.

It is almost impossible to store a labpack  
with the proper DOT shipping containers  
prior to the containers being shipped. If a  
new chemical becomes waste and can be  
added to the labpack, it becomes  
necessary to relabel it because often the  
DOT shipping label changes. Often waste  
haulers want to sort/visualize the labpacks  
personally resulting in shipping containers  
being unpacked and repacked  
unnecessarily. All containers in the CAA  
should be labeled "hazardous waste" with  
the start date of accumulation. They can be  
labeled in accordance with DOT  
requirements immediately prior to shipping  
(which is when the DOT rules become  
8 effective).

## Hazardous Waste Forum Survey - Small Quantity Generator Responses

Just follow federal guidelines. Place "hazardous waste" satellite accumulation labels on two opposite sides of the satellite accumulation containers.

9 I see nothing wrong with the labeling procedures now

10 1. We contract with a licensed hazardous material disposal company to package our lab pack items-expired chemicals, excess, label per DOT requirements, and prepare the manifest the day of shipment. They can be sorted and stored appropriately: acids and bases in labeled corrosive cabinets. Solvents in a solvent cabinet. The cabinet can be labeled for contents. It is not overly burdensome for the two main solvent waste streams generated daily.

For drum waste streams this is not a problem but for lab packs is where I have issue. As lab pack waste is accumulated it is not practical to package the waste as you go. It is best to segregate the lab pack waste according to compatible hazard class in toots and right before shipment package the waste according to DOT shipping requirements and disposal facility requirements. For us it works best if the vendors we use bring packaging material on the date of shipping and pack and ship the same date.

□

For us what would work best and still meet your requirements for lab pack is that each individual lab pack container has the name of the chemical it contains on it. The individual lap pack item or the toot the lab pack items are in be labeled with the date of accumulation first started and the words "Hazardous Waste". For information for first responders the toots could be labeled with the DOT shipping label that applies to the material inside the toot (for me a temporary label that I can reuse works best).

12

13 Compliance with Federal regs is sufficient

## Hazardous Waste Forum Survey - Small Quantity Generator Responses

- Reduce the paper work volume; require suppliers to submit all paperwork if their customer is the end-user and/or does not resell material.
- 14** resell material.
- 15** no

- In my over 36 years of hazardous waste experience and HAZWOPER compliance, I have found that most incidents involving hazardous material/waste are serious enough that responders cannot get close enough to read container labels. OSHA requires MSDSs on all hazardous material and EPCRA requires them to be readily available to responders... require simple WSDSs (Waste Safety Data Sheets) that contain the information that would have been on the DOT Label, accessible in the same manner as the site MSDSs would be. The contents of the package, date of accumulation, and hazardous waste marking should be placed on the container while the waste is being handled and in storage on-site.
- 16** same manner as the site MSDSs would be.
- 17** may be to LQG, if timing is an issue. DOT driver and generator may not agree on specific classification of waste
- 18** specific classification of waste

- The name of the material conveys the information needed at our site. Tier II information conveys what we have on site and hazards to LEPC and Emergency response personell. We would lkike to wait until the material is ready to ship to mark them with DOT labeling due to changes as material is added to the containers.
- 19** material is added to the containers.
- 20** Allow placards be posted on the outside of the storage area

## Hazardous Waste Forum Survey - Small Quantity Generator Responses

| If about right, can you suggest any improvements or simplifications? |                |
|--|----------------|
| Answer Options   | Response Count |
|  | 37             |
| <i>answered question</i>   | <b>37</b>      |
| <i>skipped question</i>  | <b>73</b>      |

| Number | Response Text   |
|--------|---|
| 1      | no improvements come to mind  |
| 2      | None<br>Having item properly labeled at all times here dispell any confusion as to what the   |
| 3      | item is.  |
| 4      | None  |
| 5      | No  |
| 6      | No<br>My company does not generate that much waste and it normally gets hauled about  |
| 7      | once a year.<br>Stay consistent with DOT. Don't add, don't  |
| 8      | detract.<br>No, our hazardous waste hauler provides preprinted labels onto which we write the   |
| 9      | accumulation start date. It's simple.<br><br>I do have trouble with the label being correct during accumulation. the container is relabeled for shipment because of the   |
| 10     | change in manifesting requirements.<br>Although our State follows federal regulations our Company puts the DOT information on the Haz-Waste Label for information for anyone to see. In the event of an emergency for a leak or spill first responders etc, may not be able to get close enough to read the info on the container anyway and will have to get the information from the Generator before |
| 11     | getting too close.<br>Marking the waste the entire time in the same fashion it will ultimately need to be   |
| 12     | marked makes sense.   |
| 13     | none  |
| 14     | no i'm good with it.  |
| 15     | No  |
| 16     | no  |
| 17     | No  |

**Hazardous Waste Forum Survey - Small Quantity Generator Responses**

- I have no suggestions and feel that Missouri requires an adequate amount of attention that follows EPA regulatory requirements for packaging, marking and
- 18** labeling.
- 19** no
- 20** not at this time
- I think it is good, it lets us know when the drum was completed, and when the drum
- 21** was labeled.
- 22** better examples to follow should be shown
- 23** Seems to be ok at this time
- 24** None
- 25** NO
- 26** No
- The current law is not burdensome for the main solvent waste streams routinely generated daily. It is for the items we lab pack (expired chemicals, excess) that are
- 27** generated sporadically.
- Sometimes it takes our consultant a few days to classify our waste and tell us if it is DOT, State or EPA regulated or not. It can be difficult to label waste until proper
- 28** classification is determined.
- Follow the federal language for marking
- 29** and labeling during accumulation.
- As mentioned, I have a professional firm
- 30** that removes my waste.
- put out simple information mailers that would help non regulators understand what
- 31** you want
- Process appears to meet needs of shipper
- 32** and packager.
- Process seems to work well for the waste I
- 33** generate
- 34** No change is needed.
- 35** None
- 36** No suggestions
- 37** No

## Hazardous Waste Forum Survey - Small Quantity Generator Responses

| Any other options or comments regarding packaging, marking or labeling? |                |
|---|----------------|
| Answer Options  | Response Count |
|   | 13             |
| <i>answered question</i>  | <b>13</b>      |
| <i>skipped question</i>   | <b>97</b>      |

| Number | Response Text   |
|--------|---|
| 1      | Address the reuse of "inner" containers. For instance: an empty solvent bottle, reused to manage the waste before lab pack. The expence to purchase new bottles / containers when the empty bottle is going out as hazwaste anyway and can be used as an inner for the lab pack.                                  |
| 2      | We have no problem with the current system. Labling the drum is pretty easy since we use the same labels as used when they pick up the sample.  |
| 3      | No  |
| 4      | Satellite accumulation labels need an area for a "full" date to be placed on them.  |
| 5      | It is the DOT requirement.  |
| 6      | None  |
| 7      | NO  |
| 8      | We are a small lab. We do have small amounts of hazardous materials that are lab packed as needed. We contract with a licensed hazardous waste company who properly packages, labels and marks the containers per DOT regulations for shipping the day of shipping.   |
| 9      | A period should be allowed for waste classification. During that period the waste could be labeled indicating classification is PENDING. The date waste is in classification period should be tracked by owner and permission request made by owner and submitted MDNR to extend classification period if needed. |
| 10     | no  |
| 11     | Require only visible DOT label as best judgment in classification when retained in temporary storage.   |
| 12     | No  |

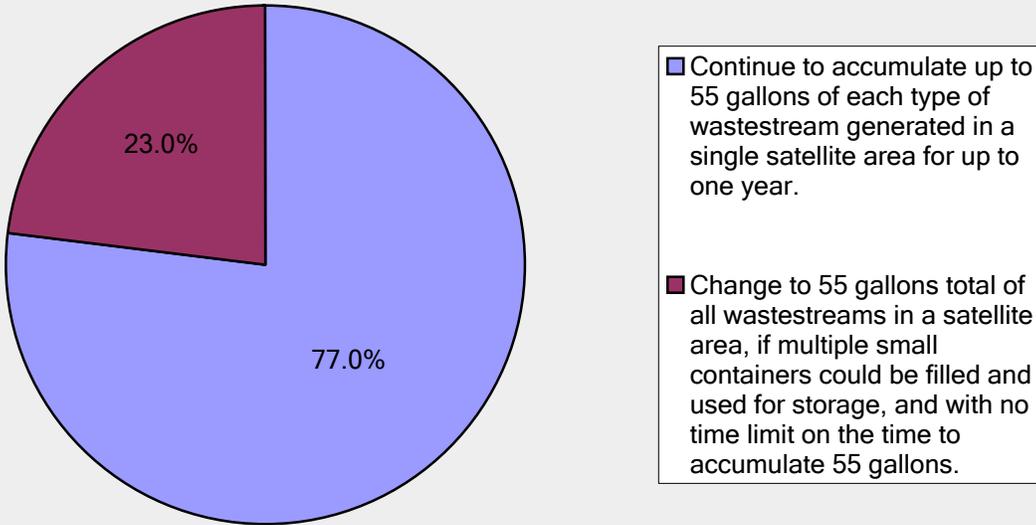
## Hazardous Waste Forum Survey - Small Quantity Generator Responses

We used premarked labels and apply them  
13 to the 55 gallon drums. It is pretty simple.

### Hazardous Waste Forum Survey - Small Quantity Generator Responses

Do you want to continue being able to accumulate up to 55 gallons of each type of wastestream generated in a single satellite area for up to a year, or would you prefer to have no time limit but be limited to only 55 gallons total of all wastestreams in a satellite area, if multiple small containers could be filled and used for storage?

| Answer Options  | Response Percent | Response Count |
|---|------------------|----------------|
| Continue to accumulate up to 55 gallons of each type of | 77.0%            | 77             |
| Change to 55 gallons total of all wastestreams in a     | 23.0%            | 23             |
| <i>answered question</i>                                |                  | 100            |
| <i>skipped question</i>                                 |                  | 10             |

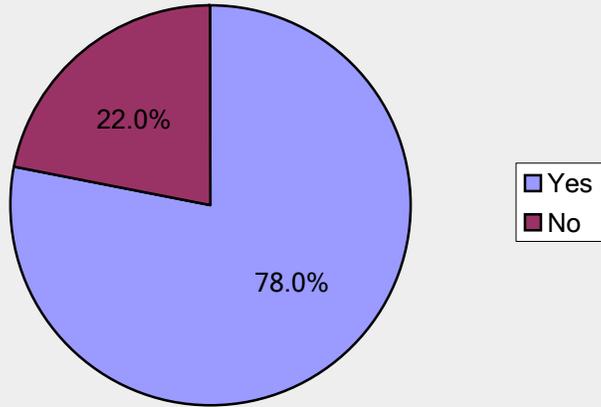


### Hazardous Waste Forum Survey - Small Quantity Generator Responses

If multiple small containers are allowed, do you support requiring additional marking on containers so individual wastestreams can be identified without opening containers?

| Answer Options           | Response Percent | Response Count |
|--------------------------|------------------|----------------|
| Yes                      | 78.0%            | 78             |
| No                       | 22.0%            | 22             |
| <i>answered question</i> |                  | 100            |
| <i>skipped question</i>  |                  | 10             |

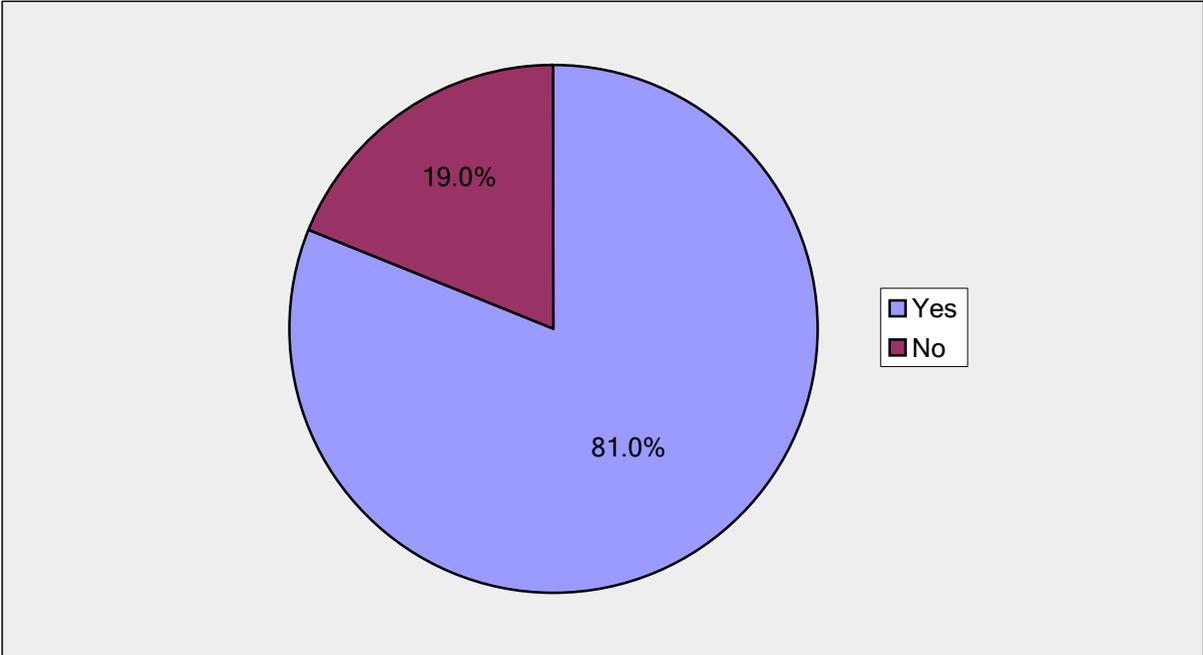
If multiple small containers are allowed, do you support requiring additional marking on containers so individual wastestreams can be identified without opening containers?



### Hazardous Waste Forum Survey - Small Quantity Generator Responses

If multiple small containers are allowed, do you support requiring that only one container at a time be filled for each wastestream and that, when filled, each container be marked with the day that you started accumulating waste in that container so it does not have to be opened to determine how much it contained?

| Answer Options           | Response Percent | Response Count |
|--------------------------|------------------|----------------|
| Yes                      | 81.0%            | 81             |
| No                       | 19.0%            | 19             |
| <i>answered question</i> |                  | 100            |
| <i>skipped question</i>  |                  | 10             |



If multiple small containers are allowed, do you have any suggestions for how new marking should be required to identify the type and amount of waste being accumulated in the satellite area?

| Answer Options           | Response Count |
|--------------------------|----------------|
|                          | 41             |
| <i>answered question</i> | <b>41</b>      |
| <i>skipped question</i>  | <b>69</b>      |

| Number | Response Text   |
|--------|---|
|        | I don't think the amount in the container is an issue. In a majority of instances, each container will be used until it is full and then moved into storage. I would recommend only marking the container to identify the contents and not labeling with dates or |
| 1      | amounts.  |
| 2      | Mark all container with content description and date started on first use.  |
| 3      | No new markings   |
| 4      | No  |
| 5      | DOT markings  |
| 6      | No  |
| 7      | No suggestions, just keep it simple.  |
| 8      | No  |
| 9      | We would not need multiple containers. We only have one stream.   |
| 10     | Consider a posted key or listing to identify each wastestream by a distinct color, which would correspond to the color of the small container for each wastestream.   |
| 11     | try to make it as simple as possible.   |
| 12     | Confused by "amount"... a "common" name that both the accumulator and the waste manager understand, combined w/ a DOT shipping name should be sufficient.   |
| 13     | label the container with the product contents   |
| 14     | not really just be consistent with what has been done in the past so it doesn't add additional confusion  |
| 15     | no  |
| 16     | perhaps just identify and hazard label  |
| 17     | Same as large containers  |

I would suggest that no containers smaller than 5 gallon containers be allowed to be  
18 used to store accumulated waste material.

Waste xyz (1 of 2) Accumulation start date\_\_\_\_

19 Waste xyz (2 of 2) Accumulation start date\_\_\_\_

I dont' understand your questions, how would opening a container tell anyone how  
20 long the waste had been accumulated?

Add a "full date" on the satellite accumulation label.

The label tells operators what is in the container, the full date would tell them to  
21 start filling a different container.

All containers to be marked for contents  
22 and date

23 No. What is in place is fine.

24 Does not apply to us.  
same labeling requirements as we have

25 now

26 NO

The laboratory has a form which lists the type of waste that is being put in the satellite container as it is being put in. Most of the satellite containers are the same or similar solvent waste from multiple HPLCs whose contents are transferred to the 180 day accumulation when the 3 to 5 gallon container is full. We have about 30 satellites which are checked approximately once a week on which should be transferred. Contents are recorded on a form. A form is also used to tracked which  
27 have been checked and which transferred.

As far as labeling requirements I would require date on each container when accumulation started, the words "Hazardous Waste", and a list of the names  
28 of the chemicals it contains.

Something visual such as different colored labels so you can identify the container  
29 from a short distance.

30 Follow existing RCRA regulations

31 follow federal guidelines for labeling

32 basic label, waste, accumulation date markings provided by suppliers, so "local" operators do not have to create these

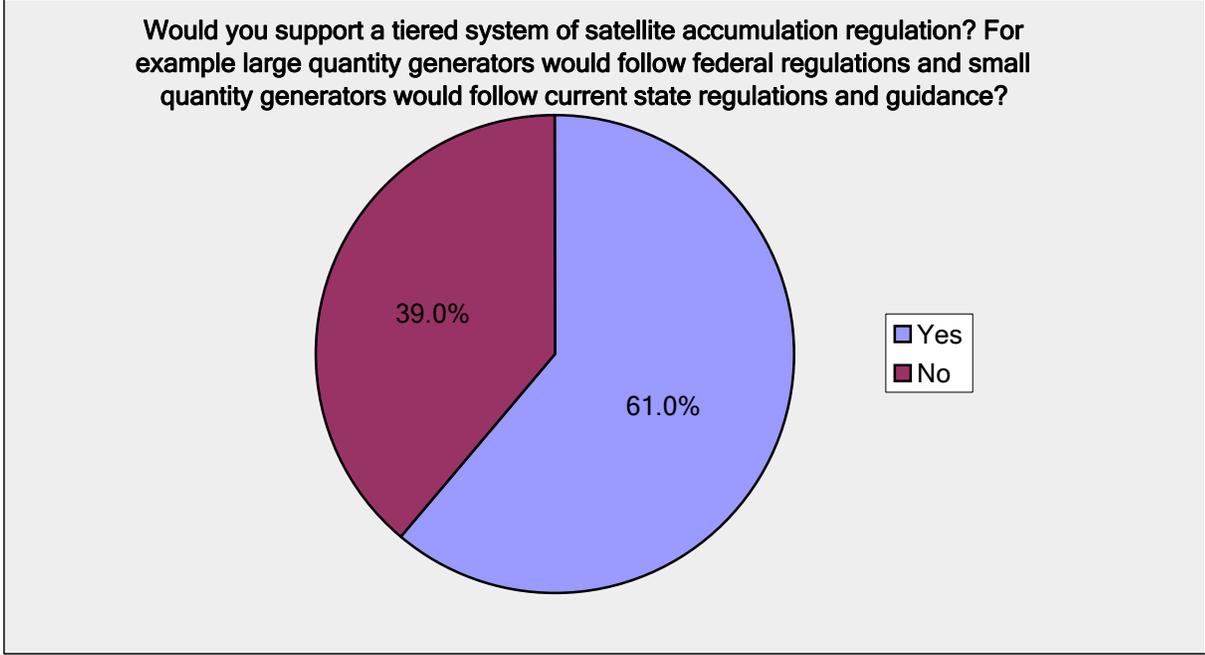
33 markings.

- 34** No... but I am strongly not in favor of multiple small containers.
- 35** I do not support multiple small containers.
- 36** label  
Mark with date, content, satellite accumulation hazardous waste and tracking mechanism to determine volume for each
- 37** container of waste generated  
MAK WITH DATE, CONTENTS,  
SATELLITE ACUMULATION AND  
TRACKING RECORS TO KEEP TRACK
- 38** OF TOTAL VOLUME
- We know how long it takes to fill our containers and we implement a time limit on ourselves to empty container before the container could possible be filled. We
- 39** simply empty our containers each day.  
Each storage label should have description, physical state, start date of accumulation & generators name and address. Qty by month could be on a sepearate sheet in
- 40** area.
- 41** same markings as the large containers

### Hazardous Waste Forum Survey - Small Quantity Generator Responses

Would you support a tiered system of satellite accumulation regulation? For example large quantity generators would follow federal regulations and small quantity generators would follow current state regulations and guidance?

| Answer Options           | Response Percent | Response Count |
|--------------------------|------------------|----------------|
| Yes                      | 61.0%            | 61             |
| No                       | 39.0%            | 39             |
| <i>answered question</i> |                  | 100            |
| <i>skipped question</i>  |                  | 10             |



## Hazardous Waste Forum Survey - Small Quantity Generator Responses

| Any other options or comments regarding satellite accumulation regulations? |                |
|---|----------------|
| Answer Options  | Response Count |
|   | 27             |
| <i>answered question</i>  | <b>27</b>      |
| <i>skipped question</i>   | <b>83</b>      |

| Number | Response Text   |
|--------|---|
| 1      | No<br>Allow other satellite areas to combine waste, reduce the number of containers in adjacent laboratories that generate the same waste.  |
| 2      | Allow 55 gallons for an extended period greater than one year. Would save \$\$ for small generators with waste streams that do not generate rapidly. If more rapid generation they would still have to move to storage area.  |
| 3      | Too confusing for folks to remember this if they went from SQG to LQG   |
| 4      | The current requirements seem to work well for all generators, I am not sure what if any gain for safety there would be to changing the current system to something harder to understand and to keep in compliance with so many different smaller containers and additional labeling requirements, keep it simple. If it takes you a year to fill a drum then use a smaller container and ship it out more often, I think the requirement reads up to a 55 gal drum but doesn't restrict using a smaller one if it works better, no need to change laws when it already allows flexibility depending on the generator's accumulation pattern. If a generator wants to have smaller containers for a waste stream and keep his amount below 55 gals total he can under current regulations, Say you have a generator that fills a 55 gal drum every three months, ships it out and starts over, By changing the law he would now have to use a smaller container and ship it out maybe every two or weeks. He will not be happy. |
| 5      |   |

## Hazardous Waste Forum Survey - Small Quantity Generator Responses

Question #5 would add confusion to the system.[]

No time limits would allow the sat. accum. cont. to be filled b-4 transporting thus minimizing excess cost of transporting smaller quantities of material along with minimizing exposure in the transportation system (4 small shipments compared to

6 One regular sized shipments).

The one year limit is a burden. May not generate a 5 gallon bucket but have to ship

7 off.

8 nope

9 no

It seems that all generators should follow

10 the same guidelines

11 No

Print Best Practices and have on-line digital

[]

12 pictures of clean, well-maintained SAA's.

We intend to follow the Academic Labs

13 Rule guidance when Missouri adopts it.

Need the ability to collect a small quantity of hazardous waste, in 5-gallon containers or less, during an 8 hour shift, in properly labeled small containers for disposal into satellite accumulation points at the end of

14 shift.

Test for reaction of the chemical to the

15 containers so leaks can be prevented.

change always causes confusion. It would

16 be nice to leave things as is.

17 use federal regulations

18 None

19 NO

I strongly support Missouri's goals to have the generated waste handled in a safe manner. I do believe that small analytical laboratories generate small amounts of

20 different types of waste.

We have solvent waste accumulated in 1 gal jars in the lab. It doesn't make sense to require a pick up each time one of these jars is full. They have storage in there cabinet to hold several 1 gal jars, it makes more sense to pick up multiple jars at one time. For us we never have more than 5 1-gallon containers total at a time but for others I could see this needing to be a

21 higher amount.

22 Follow existing RCRA regulations

**Hazardous Waste Forum Survey - Small Quantity Generator Responses**

- Generator size has no bearing on the severity of the waste being accumulated in Satellite; consequently, I believe the
- 23** Federal Regulations are more appropriate. keep the 55 gallon limit because this size is most often shipped. smaller containers will cost more in labor because of transfer time
- 24** and frequency.
- Satellite accumulation regulations offer a great option for the generation of small quantities of hazardous waste in terms of
- 25** on-site management and cost control  
SATELLITE ACUMULATION OFFERS A GOOD WAY OF STORING SMALL QUANTITIES OF WASTE OVER A LONGER
- 26** PERIOD OF TIME.
- In some instances larger companies have their own regulations in that are more
- 27** stringent than federal or state regulations.