HAZARDOUS WASTE SATELLITE ACCUMULATION

This fact sheet and the accompanying table provide general information about Missouri’s satellite accumulation regulations. Please be aware the Code of State Regulations (CSR) currently offers two options for managing hazardous waste in satellite accumulation areas; however EACH satellite accumulation area at a facility must be operated under only one of these options: 1) according to 40 CFR § 262.34(c) which is adopted by reference, or 2) according to a manner specific to Missouri. Regulations for both options can be found at 10 CSR 25-5.262(2)(C)3.

What is satellite accumulation?
Satellite accumulation is the storage of hazardous waste at the point of generation. Businesses generating hazardous waste are allowed to store small amounts of hazardous waste at or near the equipment or process generating the waste and under the immediate control of the operator of the process generating the waste. Satellite accumulation areas do not have to meet the full requirements applying to central accumulation areas or hazardous waste permitted storage areas.

What are the requirements for Satellite Accumulation Areas?
Federal and state regulations require hazardous waste generators to meet specific standards for storing hazardous wastes as summarized below. If a satellite accumulation area does not meet these conditions, the facility could be violating the federal regulations in 40 CFR § 265.31 (which Missouri incorporates) and have an increased risk of fire, release or other emergency. Currently the CSR provides two options for managing a satellite accumulation area; Federal (Option 1) and State (Option 2) which are adopted by reference into the CSR. A facility with more than one satellite accumulation area may use a single option or both so long as each satellite accumulation area follows the regulations for a single specified option.

The following apply to all satellite accumulation areas:

- Satellite containers must be stored at or near the point of waste generation where wastes initially accumulate and under the control of the operator of the process generating the waste.
- Containers used for satellite accumulation must be in good condition and made of materials compatible with the hazardous wastes placed in the containers.
• Containers in satellite accumulation areas must be properly marked with words identifying their hazardous waste contents.
• Containers in satellite accumulation areas must be kept securely closed unless waste is being added or removed. The waste must be handled in a way to prevent or minimize the possibility of exposure, loss of vapors, spills, fires, etc.
• There is no limit to the number of different compatible wastestreams that can be in the same satellite accumulation area.
• Containers in satellite accumulation areas cannot be moved from one satellite accumulation area to another.

The generator must also comply with the requirements and conditions of either option noted below:

Option 1 - operating according to 40 CFR § 262.34(c) incorporated by reference.

• No more than a total of one quart of acutely hazardous wastes or a total of 55 gallons of any non-acutely hazardous wastes may be stored in a satellite accumulation area.
• The generator may have multiple containers of each wastestream in a satellite accumulation area (if not exceeding 55 gallons total of all wastestreams in that area).
• When the total amount of hazardous wastes in that satellite area exceeds one quart of acutely hazardous wastes or 55 gallons of non-acutely hazardous wastes, the excess must be removed within three calendar days.
• The generator must mark the container holding the excess accumulation of hazardous waste with the date the excess amount began accumulating.
• The container must then be placed in a regulated storage area within three days of the date on the container or shipped off-site to a permitted Treatment, Storage and Disposal (TSD) facility using a licensed hazardous waste transporter.

Option 2 - specific to 10 CSR 25-5.262(2)(C)3 – This option differs from the federal regulations by allowing up to 55 gallons per wastestream per satellite accumulation area, but limiting storage time to one year.

Notification is no longer required to use this option therefore any satellite accumulation area in which a container that is not full has been dated will be assumed to be operating under this option and inspected in accordance to 10 CSR 25-5.262(2)(C)3.

• The generator may not use more than one container per wastestream, but may accumulate up to one quart of acutely hazardous or 55 gallons of non-acutely hazardous waste per wastestream.
• Partially full containers cannot be stored in satellite accumulation areas for more than one year from the date satellite accumulation began in that container. Within three days of reaching the one year limit, the waste container must be removed.
• The generator must not store more than one quart of each acutely hazardous wastestream or 55-gallons of each non-acutely hazardous wastestream per satellite accumulation area; however, the generator may start a new container during the three-day excess storage period if meeting all other applicable satellite accumulation requirements.
• When the container of hazardous waste has reached the one year time limit, is full or has reached the volume limit, the waste container must be moved to a hazardous waste generator storage area, a permitted storage area or be shipped off site for legal management within three calendar days.