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Program Management



24th California Unified Program
Annual Training Conference
March 22, 23, 24, 29, 30, 31 - 2022



Satellite Waste Management

Presented by:



Introduction

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- Answerline™ for one year
- Regs of the Day™
- Tips of the Week™
- Book Updates

Objectives

- “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.....

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

In the Beginning.....

- 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.....

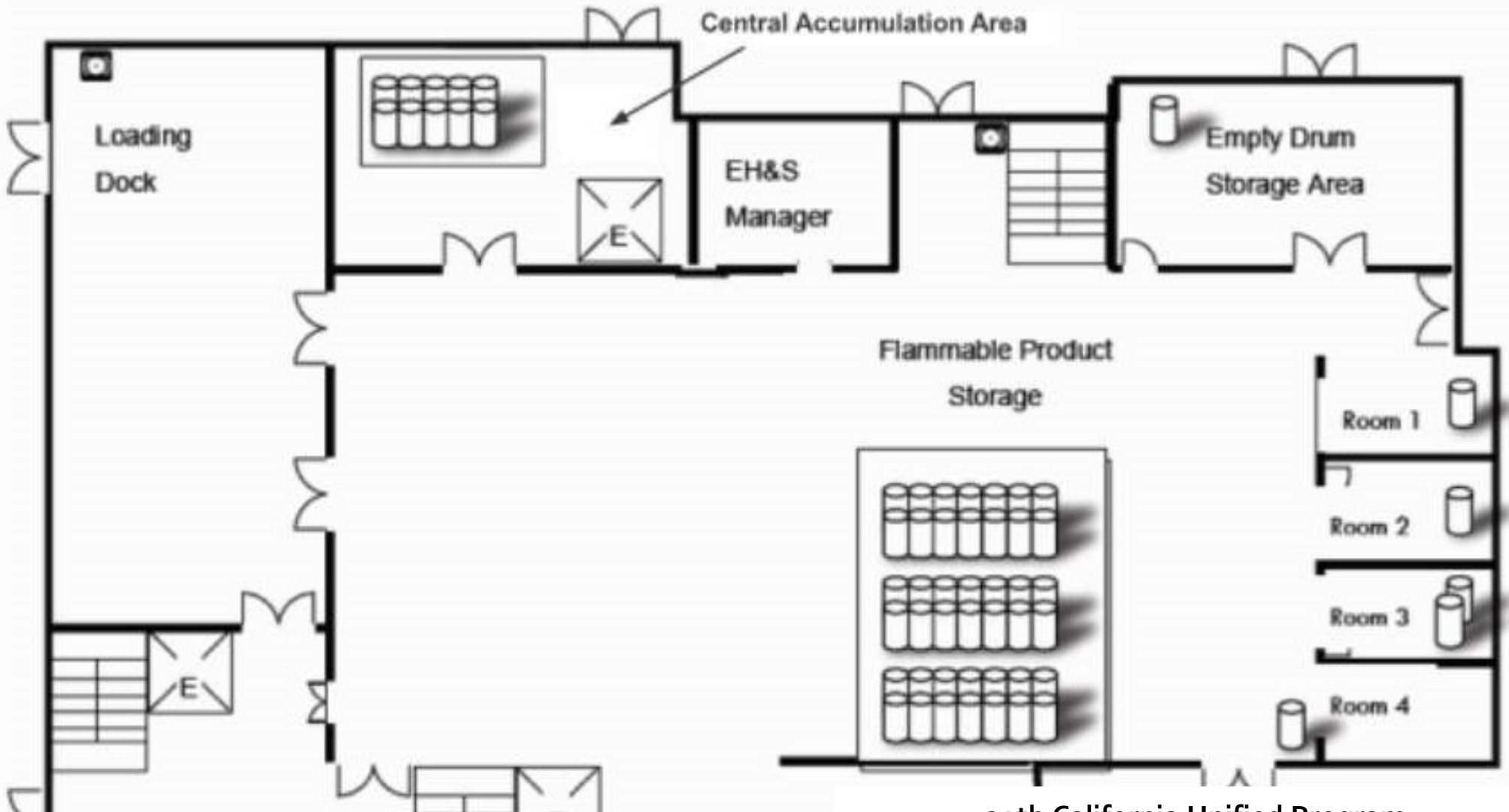
- Original regulations made no distinction between initial point of generation (“satellite”) and the central storage area where wastes are consolidated for on-site management or transportation off site



The Satellite Area

- “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



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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”

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

Moving Satellite Waste

- 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

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

Under the Control of the Operator

HWGIR

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

Pop Quiz

- 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?

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



Pop Quiz

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

⚠ DANGER
HAZARDOUS WASTE
Paint
All Drums Must Be
GROUNDING

⚠ DANGER
HAZARDOUS WASTE
Solids / Filters
All Drums Must Be
GROUNDING

⚠ DANGER
HAZARDOUS WASTE
Solvents
All Drums Must Be
GROUNDING

⚠ DANGER
HAZARDOUS WASTE
Solids - Filters
Keep lid Latched
at all times

Red funnel on top of a black drum. The drum has a red diamond-shaped hazard label with a flame icon and the text "FLAMMABLE LIQUID". The drum also has "PAINT" written in yellow on its side and a white hazardous waste label.

Black funnel on top of a green drum. The drum has a red diamond-shaped hazard label with a flame icon and the text "FLAMMABLE LIQUID". The drum also has "SOLIDS & FILTERS" written in yellow on its side and a white hazardous waste label.

Red funnel on top of a black drum. The drum has a red diamond-shaped hazard label with a flame icon and the text "FLAMMABLE LIQUID". The drum also has "SOLVENT THINNER" written in yellow on its side and a white hazardous waste label.

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

- 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 “C’s” for Satellite Containers

- 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

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



Compatible

HWGIR

- New Federal additions
 - Do not place in same container
 - Do not place in unwashed container
 - Separate or protect by any “practical means”



Closed

- Closed except when necessary
 - Add
 - Remove

- “Tip test?”



Closed

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



22 CCR 66262.34(e)(1)(E)

Markings

- “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: SOLID LIQUID | HAZARDOUS PROPERTIES: CORROSIVE REACTIVITY OTHER _____ FLAMMABLE TOXIC

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

HANDLE WITH CARE!

CA Version

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: SOLID LIQUID | HAZARDOUS PROPERTIES: FLAMMABLE TOXIC
 CORROSIVE REACTIVITY OTHER _____

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

HANDLE WITH CARE!

HAZARDOUS WASTE

STATE AND FEDERAL LAW PROHIBITS IMPROPER DISPOSAL

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: IGNITABLE TOXIC CORROSIVE REACTIVE

GENERATOR'S NAME _____

ADDRESS _____

CITY _____ STATE _____

EPA ID. NO. _____ MANIFEST TRACKING NO. _____

COMPOSITION AND PHYSICAL STATE _____

DOT PROPER SHIPPING NAME _____

DOT IDENTIFICATION NUMBER _____
 (Must fill the height of the box to comply with §172.301.)

HAZARDOUS WASTE - HANDLE WITH CARE



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Reaching Quantity Limits

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



22 CCR 66262.34(e)(3)

What Does That Mean?

- 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

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

Three Days - Federal

- 3 days – Not 72 hours
- “Consecutive calendar days”

Three Days - California

- “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.”

Federal

2018 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			

Presidents
day

Reach 55
gallons

© BlankCalendarPages.com

Federal

2018 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!

© BlankCalendarPages.com

Accumulation Time Limits

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

Pop Quiz

90-Day Generator

Satellite start date



Reach 55-gallon
date



Ship off site date



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Pop Quiz

90-Day Generator

Satellite start date



Reach 55-gallon
date



Ship off site date



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Pop Quiz

90-Day Generator

Satellite start date



Reach 55-gallon
date



Ship off site date



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Pop Quiz

90-Day Generator

Satellite start date



Reach 55-gallon
date



Ship off site date



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Pop Quiz

90-Day Generator

Satellite start date



Never
Filled



Ship off site date

?



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Pop Quiz

90-Day Generator

Satellite start date



Never
Filled



Ship off site date

12/31/22



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Training?

“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.”

Training?

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

Inspections?

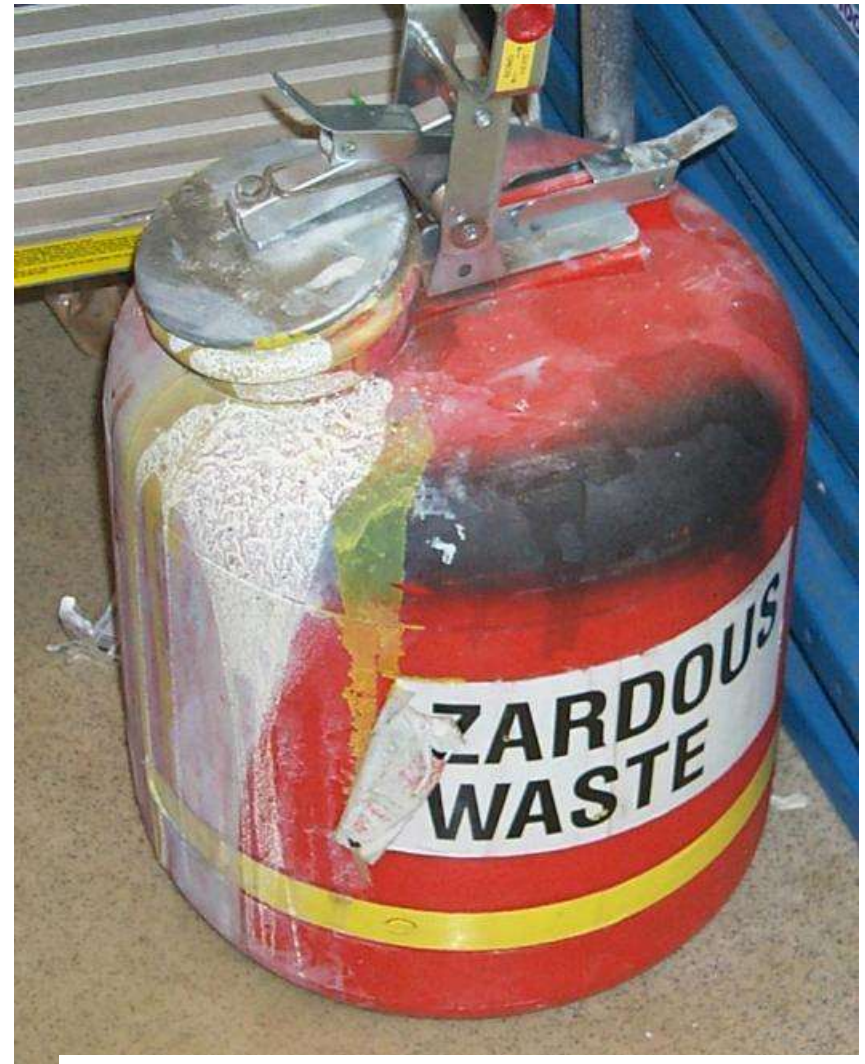
- Not required
- EPA believed “under the control of an operator” and the container rules would, in essence, be equivalent

Secondary Containment?

- Not required
- Reasons you may voluntarily have it
 - CWA
 - SPCC
 - Good management practice



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Emergency Preparedness and Prevention

HWGIR

- 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

HWGIR

- 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

- * 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

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HWGIR Changes to Satellite

- * 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

Environmental Resource Center®

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Thank You!

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