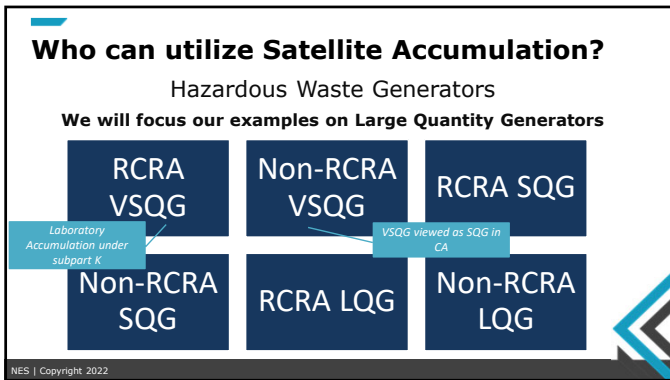




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2

What is a hazardous waste?

Any waste generated at a facility that is listed under RCRA (40 CFR 261.30) and California non-RCRA (22 CCR 66261.30) or that demonstrates a characteristic of ignitability, corrosivity, reactivity or toxicity as defined by 40 CFR 261.20-261.24 and 22 CCR 66261.20-66261.24.

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Is Satellite Accumulation Applicable?

Depends on the facility and operations...

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Hazardous Waste Considerations

Before implementing any satellite accumulation areas in the workplace, first consider the following:

1. How much waste do I generate during my accumulation period?
2. Could I reduce container size?
3. Am I utilizing containers or tanks for current generation?
4. Am I generating multiple waste streams within the applicable areas?
5. Are those waste streams compatible?
6. Do other exemptions already apply?

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5

Hazardous Waste Considerations

Before implementing any satellite accumulation areas in the workplace, first consider the following:

- How much waste do I generate during my accumulation period?
 - If containers are full at the end of my accumulation period, I may not need satellite accumulation areas.
 - HW transporter will charge for full container regardless of fill, expending same amount resources.
 - If, however, containers are $\frac{3}{4}$ full or less during regular accumulation period, satellite accumulation may be of assistance.

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Hazardous Waste Considerations

Before implementing any satellite accumulation areas in the workplace, first consider the following:

- Could I reduce container size?
 - Are my containers less than 1/2 full when my accumulation period is up?
 - Would a smaller container cost me less through my transportation company?

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Hazardous Waste Considerations

Before implementing any satellite accumulation areas in the workplace, first consider the following:

- Am I utilizing containers or tanks for current generation?
 - If utilizing tanks for HW storage during accumulation, satellite accumulation will not be allowed.
 - Only containers are allowed to be utilized for satellite accumulation...with size limitations.
 - Up to 55 gallons, **OR** 1 qt for any acute or hazardous waste stream.

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Hazardous Waste Considerations

Before implementing any satellite accumulation areas in the workplace, first consider the following:

- Am I generating multiple waste streams within the applicable areas?
 - In one single accumulation area, am I generating multiple waste streams?
 - Do I need satellite containers for each waste stream?
 - How many containers am I permitted to have?
 - Depends on the waste streams...

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22 CCR 66262.34(e)(2)

9

Hazardous Waste Considerations

Before implementing any satellite accumulation areas in the workplace, first consider the following:

- Are those waste streams compatible?
 - If all generated waste streams in one potential satellite accumulation area are compatible, then only one container will be permitted.
 - If, however, the waste streams are not compatible....you are permitted to have more than one container in the satellite accumulation area.

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Hazardous Waste Considerations

Before implementing any satellite accumulation areas in the workplace, first consider the following:

- Do other exemptions already apply?
 - Is my waste stream a universal waste?
 - Universal waste streams already get one year allowance for accumulation.
 - Am I really utilizing 'empty daily' vs. satellite accumulation?
 - 'Empty daily' can apply to a temporary container that is emptied into a larger container at the end of each operational day and does not allow for accumulation.

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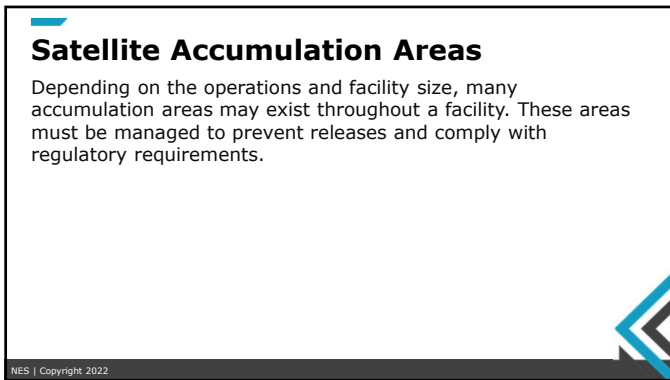
Knowledge Check ???

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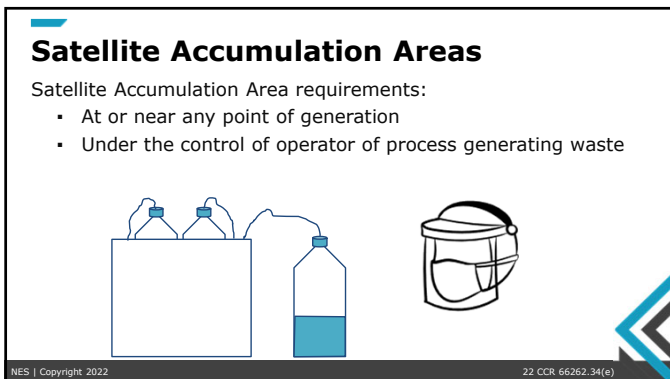
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Satellite Accumulation Areas

- Satellite Accumulation Area requirements:
 - Only containers can be used
 - Limit of 55 gallons (1 qt for acute or extremely hazardous waste) per waste stream
 - One container per waste stream
 - Unless generator determines using one container is not practical or safe (subject to DTSC review and approval)

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Satellite Accumulation Areas

- Satellite Accumulation Area requirements:
 - Must meet all container management standards
 - Container must be closed, except when adding or removing waste
 - Container must be compatible with the contents and in good condition
 - No rust, no leaks, no dents
 - Weekly inspections are not required, but are recommended

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Satellite Accumulation Areas

- Satellite Accumulation Area requirements:
 - Container can be stored on-site for no more than one year OR
 - From the fill date, regular accumulation storage time per generator status, whichever is first
 - Container must be dated within three days of when it reaches capacity

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Laboratory Accumulation Under Subpart K

- Applicable for any eligible academic entity
 - College or university
 - Teaching hospital
 - Non-profit research institute that is owned or has a formal written affiliation with a college or university
- Maximum accumulation time in the laboratory 6 months
- Maximum container size of 55 gallons or 1 qt of 6 P-listed reactive acutely hazardous unwanted materials
- Time allowed for exceedance of accumulation (to mark the container full) is 10 days

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Knowledge Check
???

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Chemical Compatibility

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Chemical Compatibility

- The chart is provided in 40 CFR 265 Appendix V
- Link to alternate chart from Fisher Scientific
 - <https://www.wisconsin.edu/ehs/download/Fisher-Scientific-Chemical-Compatibility-Chart.pdf>

SECURE/POTENTIALLY INCOMPATIBLE WASTES*			
GROUP 1A	GROUP 1B	POTENTIAL CONSEQUENCES	
<ul style="list-style-type: none"> Chlorine Gas Hydrogen Cyanide Hydrogen Sulfide Hydroperoxides Hydroxylamine Hydroxylamine Oxide Hydroxylamine Oxide Hydroxylamine Oxide Hydroxylamine Oxide Hydroxylamine Oxide Hydroxylamine Oxide 	<ul style="list-style-type: none"> Hydrogen Peroxide Hydroperoxides Hydroperoxides Hydroperoxides Hydroperoxides Hydroperoxides Hydroperoxides Hydroperoxides Hydroperoxides Hydroperoxides Hydroperoxides 	<ul style="list-style-type: none"> Explosion Reaction Flammable Gas Flammable Liquid Flammable Solid Flammable Gas Flammable Liquid Flammable Solid Flammable Gas Flammable Liquid Flammable Solid 	<ul style="list-style-type: none"> Explosion Reaction Flammable Gas Flammable Liquid Flammable Solid Flammable Gas Flammable Liquid Flammable Solid Flammable Gas Flammable Liquid Flammable Solid

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CHEMICAL COMPATIBILITY CHART

1 Inorganic Acids	2 Organic acids	3 Caustics	4 Amines & Alkylamines	5 Halogenated Compounds	6 Alcohols, Glycols & Glycol Ethers	7 Aldehydes	8 Ketones	9 Saturated Hydrocarbons	10 Aromatic Hydrocarbons	11 Olefins	12 Petroleum Oils	13 Esters	14 Monomers & Polymerizable Esters	15 Phenols	16 Alkylene Oxides	17 Cyanohydrins	18 Nitroes	19 Ammonia	20 Halogens	21 Ethers	22 Phosphorus, Elemental	23 Sulfur, Molten	24 Acid Anhydrides							
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Knowledge Check

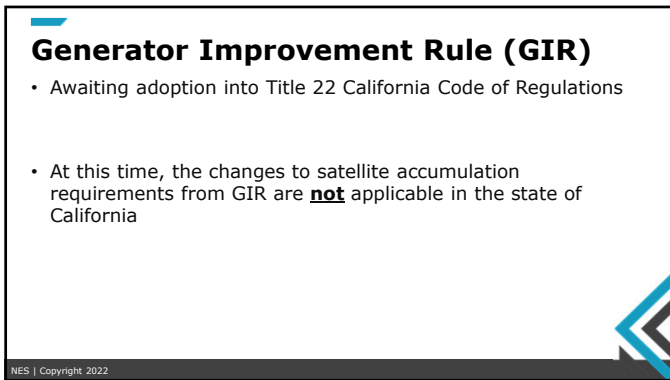
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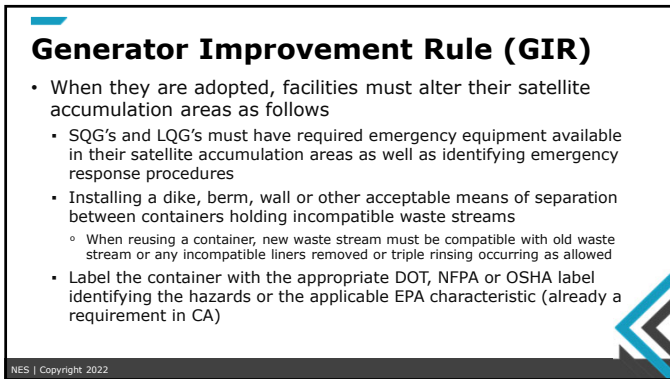
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Generator Improvement Rule (GIR)

- All other requirements are standing requirements in California Code of Regulations Title 22
- Visit DTSC for more information on GIR:
 - <https://dtsc.ca.gov/generator-improvements-rule/?emrc=63f3e6483da0d>

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Violations

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General Housekeeping Practices

- Poor housekeeping can result in an increase in the amount of hazardous waste generated and potential violations
 - Closure – protects workers from the waste and the waste from the elements
 - Spillage – must be cleaned up in a timely manner
 - Labeling – must be legible and visible
 - Inventory – do not exceed allowances
 - Violations can result in fines up to \$70,000 per violation, per day

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THANK YOU!



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