



Hazardous Waste Accumulation After the GIR

Scott R. Lyons, CHMM

TU-B3

March 25, 2025

27th California Unified Program
Annual Training Conference
March 24-27, 2025



Satellite Accumulation

(storage for >90 days without permit)



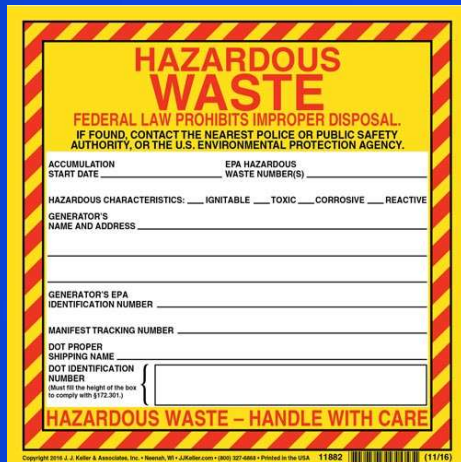
- Limited quantity:
 - Acute wastes/EHW : 1-qt/1-kg
 - Nonacute wastes: 55 gallons
- At or near point of generation
- Under the control of the operator

■ **MARKING** and dating:

- "Hazardous Waste"
- Initial accumulation start date
- Generator name/address
- Composition and physical state
- Indication of hazard(s)
- Excess quantity date
(if applicable)

SAA Containers

Examples: Indication of the Hazard



HAZARDOUS WASTE
FEDERAL LAW PROHIBITS IMPROPER DISPOSAL.
IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY
AUTHORITY, OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY.

ACCUMULATION START DATE _____ EPA HAZARDOUS WASTE NUMBER(S) _____

HAZARDOUS CHARACTERISTICS: ___ IGNITABLE ___ TOXIC ___ CORROSIVE ___ REACTIVE

GENERATOR'S NAME AND ADDRESS _____

GENERATOR'S EPA IDENTIFICATION NUMBER _____

MANIFEST TRACKING NUMBER _____

DOT PROPER SHIPPING NAME _____

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

HAZARDOUS WASTE - HANDLE WITH CARE

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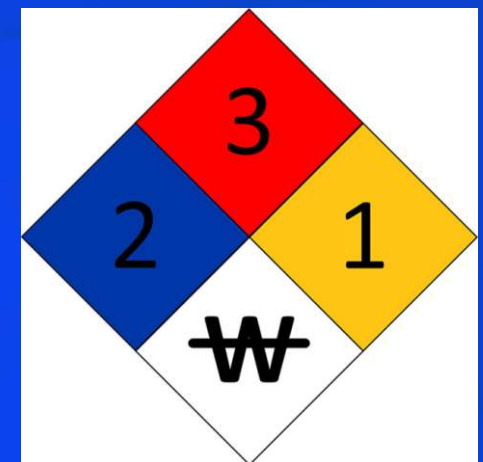
Words identifying
an applicable
characteristic



DOT label
or placard



OSHA hazard
statement or
pictogram



NFPA Code 704
chemical hazard label

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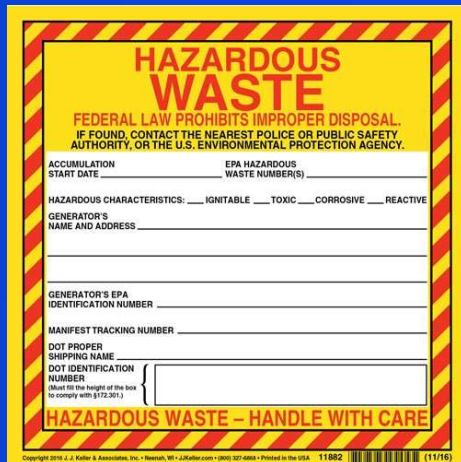
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Examples: Indication of the Hazard



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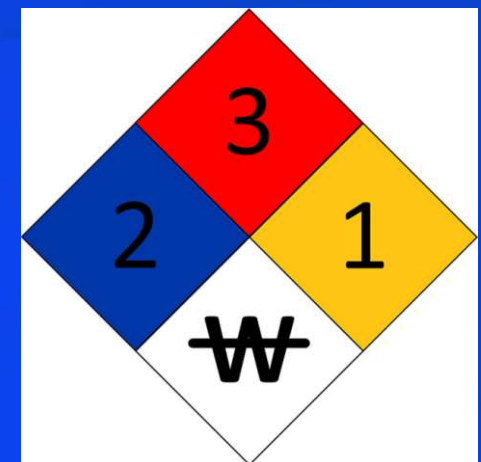
Words identifying an applicable characteristic



DOT label or placard



OSHA hazard statement or pictogram



NFPA Code 704 chemical hazard label

Satellite Accumulation


A satellite is shown in space, oriented diagonally. It has a central body with a large, white, multi-faceted antenna or sensor. Two large, blue, rectangular solar panels are extended from the sides. The background is the dark blue and black of space, with a thin white line representing the Earth's horizon.

- Containers closed except:
 - Adding, removing, or consolidating waste
 - Venting for safety
- Waste Compatibility
- Accumulation up to one year without a permit

 See §66262.15

SAA REQs

- Preparedness and prevention
- Contingency plan (LQGs)
- Emergency procedures

 See §66262.15, RU 6.2, RO 14703, 14826

Laboratory Accumulation

- Accumulation limits same as SAA
- Laboratory accumulation area
 - As close as practical to POG
 - In lab room or another onsite location
- One-year time limit
- Less labeling than SAAs



90/180/270-Day Accumulation

(longer accumulation requires a higher-tier permit)

Allowed units:

- Containers Articles 27, 28, and
28.5 for LQGs
- Tanks
- Drip pads
- Containment buildings

Labeling & Tracking the 90/180/270-Day Clock



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HAZARDOUS WASTE – HANDLE WITH CARE





9219
8202

9205
8207

ED90679

9207

9224
8200

ED90529

ED90718

9225
8201

General Facility Standards

- Preparedness and prevention
- Contingency plan (LQGs)
Emergency procedures (SQGs)
- Employee training
- LQGs: Closure

 See §66262.16 (SQGs), §66262.17 (LQGs), RU 6.3

Pretransport Reqs.

- Packaging
- Labeling
- Marking
- Placarding

 See Chapter 12, Article 3

What's new post-GIR?

- LQG QRG
- Few other changes pre- to post-GIR
 - Mostly reorganizes reqs. into §§66262.15–17

What's unique in CA?

- Didn't adopt episodic generation provisions
- VSQGs reg. nearly same as SQGs, no §66262.14
- Extra labeling (e.g., gen. name, start date)
- No drip pads/containment buildings for SQGs
- No drip pads for LQGs

What's unique in CA?

- No 24-hour emergency response waiver
- SQG >1-kg acute/extremely HW 90-day limit
- Accum. time extension for non-RCRA HW
- No Foo6 accum. time extension for LQGs
- No waiver Doo1/Doo3 wastes within 15 meters of property line for LQGs

What's unique in CA?

- LQGs can't consolidate HW from VSQGs
- LQG rejected and returned hazardous waste must be labeled as rejected
- LQG training must comply with 8 CCR §5192(p)
 - Hazardous Waste Operations and Emergency Response

What's unique in CA?

- SQG 180-day accum. time begins:
 - If ≤ 100 kg non-acute or ≤ 1 kg acute/EHW generated in a month, then begins when >100 kg/ 1 kg accumulates
 - If generated >100 kg non-acute HW in a month, then begins when that amount first accumulates
- No adoption of §262.35 liquid in landfills ban;
§66262.25 procedures for accum. time extensions



Any Questions?

Scott R. Lyons, CHMM, McCoy and Associates
slyons@mccoyseminars.com
303-526-2674

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