



GECAP

Georgia Environmental Compliance Assistance Program

<http://www.gecap.org>

Satellite Storage of Hazardous Waste

GECAP of the Georgia Tech Research Institute is a voluntary, non-regulatory environmental compliance program funded by the Georgia Legislature through the University System of Georgia.

Waste stored in the main hazardous waste storage area, must be labeled and dated on the first day waste enters the drum. From that date, as a conditionally exempt small quantity generator (CESQG), the drum can be located onsite any number of days as long as the total hazardous waste stored does not exceed 2,200 lbs. As a small quantity generator (SQG), the waste can only be stored in the main storage area for 180 days. As a large quantity generator (LQG), the waste can only be stored in the main storage area for 90 days. A discussion of CESQG, SQG, and LQG general requirements can be found in the GECAP Tech Guide [Hazardous Waste Generator Requirements](#).

Generators accumulating hazardous waste in satellite accumulation areas must comply with container standards specified in Sections 265.171-173 in Title 40 of the Code of Federal Regulations (CFR). Whether a facility is a CESQG, SQG or a LQG of hazardous waste, a hazardous waste drum or container located in a "satellite storage" area does not begin its accumulation start date until the drum is filled and moved to the main hazardous waste storage area. Drums and containers in satellite storage areas must always

be closed and must be labeled as hazardous waste; however, these containers do not need to be dated until they are filled. Containers must be in good condition and be compatible with the type of waste being stored. A maximum of 55 gallons of hazardous waste or one quart of acutely hazardous waste can be stored in the satellite storage area. The 55-gallon limit applies to the total of all the non-acutely hazardous waste accumulated at a satellite accumulation area. However, there is no limit on the total number of satellite areas at the facility. Acutely hazardous wastes are P-listed and can be found in 40 CFR 261.33(e). In addition to this list, other acutely hazardous wastes include hazardous waste codes F020-F023 and F026-F027. Once a drum (or other container) in a satellite storage area is filled it must be dated. Within three days, the drum must be moved to the main hazardous waste storage area.

For More Information

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