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Hazardous Waste Satellite Accumulation Policy	Document No.	4005.001
	Revision No.	1.0
	Effective Date	

1.0 Purpose

1.1 The purpose of this policy to clarify ADEQ’s definition of how much hazardous waste may be accumulated in a satellite accumulation area before the accumulation of waste is considered a “hazardous waste storage area.”

1.1.1 The regulations do not indicate how many containers of waste may be accumulated at the point of generation before the 90/180/270 day requirements must be followed. Additionally, the regulations do not indicate the number of satellite accumulation areas allowed at a facility.

2.0 Revision History

Date	Rev. No.	Change	Ref. Section
6/29/05	1.0	Policy Revision, New Format	0063.000

3.0 Persons Affected

3.1 Hazardous Waste Inspections and Compliance Unit, Waste Programs Division

4.0 Policy.

The policy of ADEQ is to ensure that:

4.1 Hazardous waste in a satellite accumulation area will be managed in compliance with A.A.C. R18-8-262(A) and (D) [40 §262.34(c)(i)] when:

4.1.1 It is managed at or near the point of generation where it is initially accumulated; and

4.1.2 It is under the control of the operator of the process generating the waste; and

4.1.3 Less than or equal to 55 gallons per waste stream (or one quart of acutely hazardous waste) is accumulated; and

- 4.1.4 The waste is managed in compliance with 40 CFR §§ 265.171, 265.172, and 265.173(a); and
- 4.1.5 The generator marks the containers either with the words "Hazardous Waste" or with other words that identify the contents of the containers.

4.2 ADEQ does not limit the number of containers or waste streams that can be managed in satellite, a satellite area, or the number of satellite accumulation areas that a facility may have provided that conditions 1-5 are met.

5.0 Definitions

5.1 Hazardous waste storage area means the area where large quantity generators may accumulate hazardous waste for up to 90 days; small quantity generators may accumulate hazardous waste for up to 180 days (or 270 days if the waste must be transported a distance of more than 200 miles for treatment, storage or disposal).

5.2 Satellite Accumulation Area means any location at or near the point of generation where wastes initially accumulate, which are under control of the operator of the process generating the waste.

5.3 Waste stream means a specific hazardous waste separately generated by a process, and the waste is managed separately.

6.0 Responsibilities

6.1 All staff within the Hazardous Waste Inspections and Compliance Unit is responsible for knowledge and implementation of this policy.

6.2 Supervisors are responsible to insure that the information contained in this policy is consistently and equitably applied by all staff.

7.0 Procedures

8.0 Additional Documentation

8.1 A.A.C. R18-8-262(A) and (D) [40 CFR § 262.34], Accumulation Time.

8.2 47 Federal Register 1251, January 11, 1982 as amended at 65 Federal Register 12397, March 8, 2000. Volume 40, No. 246, 49570.

8.3 R18-8-262 [40 CFR §262.34(c)(1)], how much hazardous waste may be accumulated in a satellite accumulation area pursuant to before the accumulation of waste is considered a hazardous waste storage area.

8.4 40 CFR § 262.34(a), incorporated by reference in A.A.C. R18-8-262 (where hazardous waste storage requirements are found).