40 CFR §262.34(a)(2) "Labeling of Containers at Ninety-day Accumulation Areas with the Date Accumulation Begins by Large Quantity Generators" [which incorporates

§391-3-11-.08(1) of the Georgia

Rules for Hazardous Waste Management by reference]

 $\S 262.34(a)(2)$ states, the following:

- (a) Except as provided in paragraphs (d), (e), and (f) of this section, a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that:
 - (3) The date upon which each period of accumulation begins is clearly marked and visible for inspection on each container.

Generators that accumulate hazardous waste for 90 days or less are required to mark all hazardous waste containers stored for less than 90 days with the date that the period of accumulation began. Whenever waste is first added to a container in a less than 90-day storage area, or whenever containers of hazardous waste which were generated in another area of the plant (i.e., satellite accumulation area) are brought to a less than 90-day storage area, the container must be dated to indicate when the 90-day accumulation period began.

Suggestions to prevent violations of this rule include the following:

- > Training of personnel involved in hazardous waste management at the facility;
- ➤ Placing signs in less than 90-day container accumulation areas that remind personnel to mark containers with the date that accumulation began;
- > Conducting thorough inspections of less than 90-day storage areas looking for undated containers; and
- ➤ Maintaining a supply of pre-printed labels, and placing them on hazardous waste containers that are stored for less than 90 days, which have a specific area on the label to mark the date that accumulation began.