

40 CFR §262.34(c)(1)(ii) “Labeling of Satellite Accumulation Containers”

[which is incorporated into §391-3-11-.08(1) of the Georgia Rules for Hazardous Waste Management by reference]

§262.34(c)(1)(ii) states, the following:

(c)(1) A generator may accumulate as much as 55 gallons of hazardous waste or one quart of acutely hazardous waste listed in §261.33(e) in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or interim status and without complying with paragraph (a) of this section provided he:

- (ii) Marks his containers either with the words “Hazardous Waste” or with other words that identify the contents of the containers.
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Generators who accumulate hazardous waste in “satellite accumulation areas” must mark the containers of hazardous waste in those areas with the words “Hazardous Waste,” or other words to identify the contents of the container. Although not required, we suggest labeling the container with both the words “Hazardous Waste,” and words that identify the contents. For instance, a container can be labeled with “HAZARDOUS WASTE SOLVENT.” Labeling in this way prevents confusion, especially if there is more than one waste accumulated in the area (the waste can be identified as the solvent waste), and if there are both product and hazardous waste solvents stored in the area (the waste will not be confused with the product, especially since many generators re-use empty product containers to contain hazardous waste).

Suggestions to prevent violations of this rule include the following:

- Training of personnel involved in hazardous waste management at the facility;
- Maintain a supply of pre-printed labels and using them on containers of hazardous waste. Each time hazardous waste is placed in a new container, a pre-printed label can be affixed to the container that identifies the waste as “Hazardous Waste” and/or a particular waste type. If the pre-printed label is designed with a blank for the date, additional labeling will not be required.
- Conducting thorough routine inspections of areas where hazardous waste is generated to ensure that all containers of hazardous waste are properly labeled with either the words “Hazardous Waste,” or other words that identify the contents of the container.