

Accumulation & Storage of Hazardous Waste

Where can hazardous waste accumulate or be stored?

Hazardous wastes may be accumulated or stored anywhere in a facility that is maintained or operated in a manner that minimizes the possibility of fires, explosion, spills or unplanned releases of the wastes. For the purposes of Vermont Hazardous Waste Management Regulations, this means that the wastes are:

- housed in a structure that protects them from rain and snow;
- placed in good condition containers that are compatible with the wastes;
- kept in closed containers that are placed on an impervious surface; and
- protected from freezing, if applicable.

How long can hazardous waste be stored?

A Large Quantity Generator (LQG) must ship its hazardous wastes for disposal within 90 days of when the waste was generated. A Small Quantity Generator (SQG) has 180 days to ship its hazardous wastes off-site. A Conditionally Exempt Generator (CEG) may store up to 2,200 pounds of hazardous waste for an indefinite period of time.

What determines generator status?

Generator status is most often based on the type and quantity of hazardous waste generated each month. However, the amount of hazardous waste stored on-site also affects generator status as seen in the table below. For example, a facility that generates less than 220 pounds per month (CEG) but also has more than 2,200 pounds in storage (SQG), becomes a SQG for regulatory purposes and is subject to all of the standards applicable to that classification.

Amount of Hazardous Waste *	Approx. Drum equivalents (assume the weight of water)	Generated /month	Stored on-site
up to 220 pounds	half a 55-gallon drum	CEG	CEG
up to 2200 pounds	five 55-gallon drums	SQG	CEG
over 2200 pounds and up to 13,200 pounds	thirty 55-gallon drums	LQG	SQG
over 13,200 pounds	over thirty 55-gallon drums	LQG	LQG

* Generation or storage of 2.2 pounds of acutely hazardous waste always confers LQG status.

When is a hazardous waste “generated”?

The term “generated” has several different meanings when applied to hazardous waste. Since the time at which a waste is “generated” establishes how soon the waste must be shipped off-site, it is sometimes easy to imagine that a clock starts ticking as soon as a hazardous waste is “generated”. A waste is “generated” and the disposal clock starts ticking when:

1. a container is filled with hazardous waste
2. a hazardous waste satellite accumulation container is filled
3. more than 55 gallons of hazardous waste are placed in a container
4. hazardous waste is removed from a process tank
5. a container of hazardous virgin product is declared to be unusable
6. a container of hazardous waste is put into a hazardous waste storage area

What are “Satellite Accumulation Containers”?

These are containers that are used to collect hazardous wastes in work areas at or near the places where the hazardous wastes are generated.

How must containers that are in the process of being filled be handled?

For LQGs and SQGs, there are three different handling options for containers that are in the process of being filled. Where the container is located determines how it must be labeled and how soon it must be moved to a short-term storage area or shipped off-site.

Management Option	Labeling Requirements
<p>In satellite accumulation. Up to 55 gallons of hazardous waste (of an individual waste stream) may be accumulated in a container at or near the point of waste generation and under the control of employees who make the waste. When the container is full, or 55-gallons have accumulated, it must be, labeled as in (b) below and moved to a short-term hazardous waste storage area (or shipped off-site) within three days. The clock for shipment off-site starts the day the container is filled.</p>	<p>“Satellite accumulation” and “shift accumulation containers” (i.e. containers holding waste for only one “shift” or less than 12 hours), require the following information</p> <ol style="list-style-type: none"> 1) the words “Hazardous Waste” 2) words that identify the contents of the container
<p>In the short-term storage area. Hazardous waste may also be “accumulated” in the hazardous waste short-term storage area by one of two methods.</p> <p>(a) In this case, waste is brought to an accumulation container in the short-term storage area by the end of each work shift (or within 12 hours). When the container in storage is full, or when 55-gallons of the waste stream has accumulated, the clock for shipment off-site starts and the date must be written on the container. While waste is being accumulated, the container must meet all short-term storage area requirements, but it does not have to be dated.</p>	<p>“Accumulation” containers in the short-term storage area need the following information on their label:</p> <ol style="list-style-type: none"> 1) Words to identify that it is an accumulation container 2) The point of waste generation 3) The generator’s name 4) The generator’s address 5) The generator’s EPA identification number 6) The name and hazardous waste identification number(s) of the hazardous waste 7) The words “Hazardous Waste-Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.”
<p>(b) This option allows a generator to add waste to a container in the hazardous waste short-term storage area on an infrequent basis rather than every 12 hours. Hazardous waste placed in a container under this option may come directly from the point of generation, or may be transferred from “satellite accumulation” containers located elsewhere in the facility. This approach works well for wastes that accumulate quickly and are routinely shipped off-site. In this case, the clock for shipment off-site starts as soon as hazardous waste is placed in the container.</p>	<p>Full or partially-full containers “in storage” in the short-term storage area need the following label information:</p> <ol style="list-style-type: none"> 1) The generator’s name 2) The generator’s address 3) The generator’s EPA identification number 4) The name and hazardous waste identification number(s) of the hazardous waste 5) The date the container was filled (if coming from satellite accumulation) or first used to store or accumulate waste 6) The words “Hazardous Waste-Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.”