



DUTY OFFICER FACT SHEETS

HAZARDOUS WASTE ACCUMULATION TIME FOR GENERATORS

EADO-2

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The Duty Officers of the Department of Toxic Substances Control (DTSC) prepared this fact sheet to provide quick reference information about hazardous waste accumulation times for generators. Hazardous waste generators, particularly those who generate small quantities, frequently contact the Duty Officers to help them sort through the complexities of how long they can accumulate various quantities of waste. We also recommend that generators read the DTSC fact sheet entitled “Accumulation of Hazardous Waste at Generator Sites”. This fact sheet, developed by DTSC’s Hazardous Waste Management Program, addresses a wide range of accumulation requirements very comprehensively. Throughout this fact sheet, numbers in bold (**66262.34**) represent citations from Title 22, California Code of Regulations (22 CCR), or, when preceded by “HSC,” from the California Health and Safety Code. While viewing the document online, clicking on the bold numbers will take you to sites containing the regulations. If you generate hazardous waste, you should consult with your Certified Unified Program Agency (CUPA). Finally, DTSC strongly encourages all businesses generating hazardous waste to consider waste minimization, source reduction and pollution prevention. Go to the Duty Officer FAQs for useful links.

For how long can hazardous wastes be accumulated in a tank or container?

The answer depends in part on the total amount of hazardous waste generated each month
[66262.34](#)

Hazardous Waste Generated

Less than

1,000 kilograms (2,200 pounds)
in a calendar month

The generator may not hold more than
1 kilogram of acutely or extremely
hazardous waste for more than 90 days.

More than

1,000 kilograms (2,200 pounds)
or
1 kilogram of acutely or extremely hazardous waste
in a calendar month

Allowed On-Site Accumulation Time Per Tank or Container

180 days or less, or
270 days or less if the waste will be
transported 200 miles or more for
treatment, storage, or disposal.

[66262.34\(d\)](#)

The quantity of waste accumulated may
never exceed 6,000 kilograms (13,200
pounds). Generator must meet the
requirements of subdivisions (**(d)**, **(e)**, and
(f) of [40 CFR 262.34](#).

90 days or less from the first date on which
any amount of hazardous waste begins to
accumulate during that month.

[66262.34\(b\)\(2\)](#)

The generator must also comply with
[66262.34\(a\)](#), [\(c\)](#), and [\(f\)](#).

When does my accumulation clock begin?

Hazardous Waste Generation Rate

Less than

100 kilograms (220 pounds) per month

or

1 kilogram of acutely or extremely hazardous waste in any calendar month

Accumulation "Clock" Begins

The time begins on the date the generator has accumulated 100 kilograms of hazardous waste or 1 kilogram of acutely or extremely hazardous waste.

More than

100 kilograms (220 pounds) per month

The time begins on the first date on which any amount of hazardous waste begins to accumulate during that month

What is "satellite accumulation," and how are the requirements different?

Because of the complexity of the satellite accumulation regulations, the Duty Officers encourage you to contact your Certified Unified Program Agency (CUPA) and/or the Duty Officer in your region. In brief, a generator may accumulate as much as 55 gallons of hazardous waste, or one quart of acutely or extremely hazardous waste, without a permit and without complying with [66262.34](#) subsections (a), (b), and (c), if:

- The waste is accumulated in containers (not tanks) at the initial accumulation point, near or at the generation point, and is under the control of the operator of the process generating it.
- The generator does not hold the hazardous waste on-site for more than one year from the initial date of accumulation, or longer than the applicable period described in the first section, whichever occurs first.
- The initial date of accumulation is clearly marked and visible on each container, and the containers are managed according to regulation. [66265.171](#) [66265.172](#) [66265.173\(a\)](#)

Within three days of reaching the quantity limits, the generator must mark the container with the date that limit was reached, and comply with the other applicable regulations discussed above.

The generator may use separate containers for different waste streams generated by a given process or group of processes if:

- The waste streams are incompatible;
- If using a single container prevents recycling;
- If using a single container requires unreasonable procedures; or
- If using a single container is not safe for the public, workers or the environment.

A 55-gallon or one quart limit applies to each group of waste streams. The generator's determination of the separation of the process wastes is subject to review and approval by DTSC at any time.

If you are considering satellite accumulation, please consult the regulations cited above. If you are not sure that your accumulation area satisfies the criteria for satellite accumulation, check with your local CUPA and/or the DTSC Duty Officers.

How do I label my accumulation containers?

To comply with the requirements [66262.34 \(f\)](#) the generator must ensure that:

- In a generator accumulation area, the initial date the accumulation begins is clearly marked and visible on each container.
- The initial date accumulation begins is clearly marked and visible on each satellite accumulation container, and another date is placed on the container when 55 gallons is reached or the container is moved to another area.
- Each container is labeled or marked "Hazardous Waste," and is labeled with the following:
 - the composition and physical state of the wastes;
 - a statement calling attention to the particular hazardous properties of the wastes (toxic, ignitable, reactive, corrosive); and
 - the name and address of the generator.

Accumulation time extensions can be granted under limited conditions. In most cases, extensions are not granted unless requested before the accumulation period has expired. DTSC handles applications for storage extensions of RCRA-regulated waste. The CUPAs can grant non-RCRA waste storage extensions. [66262.35](#)

If you cannot find the answer to your question in this fact sheet, please contact the Duty Officers directly. You can call them at 800-728-6942, or contact them via the Department of Toxic Substances Control website -- <http://www.dtsc.ca.gov> -- click on Frequently Asked Questions, and you will go to a map of California with links to the Duty Officers' email.

DTSC Duty Officers provide informal guidance only regarding management of hazardous waste for the convenience of the public. Such advice is not binding upon DTSC, nor does it have the force of law. If you would like a formal opinion on a matter by DTSC, please contact the responsible program office directly. You should also refer to the statutes and regulations, DTSC Policies and Procedures, and other formal documents.

If you believe that you have received incorrect information from a Duty Officer, please contact one of the Regional Coordinators (Carol Northrup in Northern California, at 510-540-3919; John Hinton in Southern California, at 818-551-2823). We also encourage you to complete a [Cal/EPA Customer Satisfaction survey](#) (<http://www.calepa.ca.gov/about/custsvc.htm>) so that we may improve our Duty Officer Program.