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February 5, 1996

Ms. Marsha Carra, Hazardous Waste Program Manager
Environmental Management Division
377 ABW/EMC
2000 Wyoming Blvd. SE
Albuquerque, NM 87117-5659

RE: Clarification on Satellite Accumulation Point Labeling
Requirements

Dear Ms. Carra:

The Hazardous and Radioactive Materials Bureau (HRMB) has received your January 30, 1996 letter requesting clarification on satellite accumulation point (SAP) labeling requirements.

The New Mexico Hazardous Waste Management Regulations (20 NMAC 4.1), which adopt 40 CFR §262.34(c)(1)(ii), state that a generator may accumulate hazardous waste in a SAP provided he "marks his containers either with the words "Hazardous Waste" or with other words that identify the contents of the containers." Therefore, a label with the words "Hazardous Waste" is not required if other words that sufficiently identify the contents are marked on each container. Please be aware that a HRMB inspector has the discretion as to the sufficiency of such marking.

Thank you for your inquiry. If you have any questions, please contact Mr. Michael Le Scouarnec or myself at (505) 827-1558 or at our address.

Sincerely,

Coby Muckelroy,
RCRA Inspection/Enforcement Program Manager
Hazardous and Radioactive Materials Bureau

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