

# Los Alamos

Los Alamos National Laboratory  
Los Alamos, New Mexico 87545

## memorandum

TO: Streamline Distribution  
THRU: *Allen J. Friedman*  
Allen J. Friedman, ADS  
FROM: *Doris Garvey*  
Doris Garvey, Acting Manager, ECMO  
SUBJECT: SATELLITE STORAGE OF HAZARDOUS WASTE UNDER THE NEW MEXICO  
HAZARDOUS WASTE MANAGEMENT REGULATIONS (HWMR)

DATE: August 14, 1986  
MAIL STOP/TELEPHONE: A120/7-9390  
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*11/45 Permit*

A facility at the Laboratory that treats, stores, or disposes of hazardous waste must have either a permit or interim status under current regulations. However, hazardous wastes may be stored indefinitely at a "satellite storage area" by a hazardous waste generator, provided the generator does not accumulate more than 55 gallons of hazardous waste, or one quart of an acutely hazardous waste (acutely hazardous waste as listed in HWMR 201.C.4.e.). The list of acutely hazardous wastes includes, but is not limited to, mercury and arsenic compounds and cyanides.

To maintain satellite storage area status, the generator must comply with the following regulatory requirements:

1. Wastes must be accumulated in containers at or near the point of generation.
2. Wastes must be under the control of the generator.
3. Containers must be in good condition.
4. Container material must be compatible with the waste.
5. Container must be kept closed, except when adding or removing waste.
6. The words "Hazardous Waste" must be marked on the container.

It is essential that all hazardous waste storage areas that are not permitted or do not have interim status follow these requirements.

Arrangements for disposal of hazardous wastes should be made with the Waste Management Group (HSE-7) in accordance with the Health and Safety Manual Administrative Requirements 10-3. To assure that quantity limitations are



14888

August 14, 1986

not exceeded, HSE-7 must be notified when 75% of the allowable accumulation is reached. Wastes must not be held for greater than 72 hours once the limit is reached.

If you or any of your staff need additional clarification of regulatory requirements, please contact James White of the Environmental Surveillance Group (HSE-8) at 5-0677.

DBG/mv