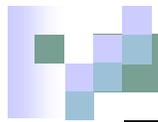


Side-by-Side Comparison: Satellite Accumulation vs. Academic Labs Rule

	Laboratories that Operate as Satellite Accumulation Areas (SAA)	Laboratories that Operate Under the Academic Laboratories Rule (Subpart K)
Regulatory Citation	<ul style="list-style-type: none"> • 40 CFR 262.34(c) 	<ul style="list-style-type: none"> • 40 CFR Part 262 Subpart K
Applicability	<ul style="list-style-type: none"> • Any SQG or LQG may establish an SAA “at or near any point of generation” 	<ul style="list-style-type: none"> • Any CESQG, SQG or LQG that is an eligible academic entity may opt into Subpart K • An eligible academic entity is a <ul style="list-style-type: none"> ○ College or university (C/U), or ○ Teaching hospital or non-profit research institute that is owned by or has a formal written affiliation agreement with a C/U
Terminology for regulated materials	<ul style="list-style-type: none"> • Hazardous waste • Acute hazardous waste 	<ul style="list-style-type: none"> • Unwanted material • Reactive acutely hazardous unwanted material
Maximum accumulation time in lab	<ul style="list-style-type: none"> • No time limit, unless maximum accumulation volumes are exceeded (see below) 	<ul style="list-style-type: none"> • Six months
Maximum accumulation volume in lab	<ul style="list-style-type: none"> • 55 gallons of hazardous waste • Total of 1 quart of 124 P-listed acute hazardous wastes 	<ul style="list-style-type: none"> • 55 gallons of unwanted material • Total of 1 quart of 6 P-listed reactive acutely hazardous unwanted materials
Time allowed to exceed maximum volumes in lab	<ul style="list-style-type: none"> • 3 calendar days 	<ul style="list-style-type: none"> • 10 calendar days
Container labeling in lab	<ul style="list-style-type: none"> • “Hazardous waste” or • “Other words that identify the contents of the container” 	<ul style="list-style-type: none"> • “Unwanted material” or “other equally effective term,” and • Information re: contents of the container, and • Sufficient information to make a hazardous waste determination, and • Accumulation start date
Hazardous waste determination	Must be made at the point of generation: <ul style="list-style-type: none"> • In the SAA • When the waste is first generated 	Choice of where and when to make: <ul style="list-style-type: none"> • In the lab, before it is shipped off-site • Within 4 days of arriving at on-site Central Accumulation Area (CAA) • Within 4 days of arriving at on-site TSD



	Laboratories that Operate as Satellite Accumulation Areas (SAA)	Laboratories that Operate Under the Academic Laboratories Rule (Subpart K)
Acutes – Hazardous waste determination and generator status	<ul style="list-style-type: none"> Any of 124 P-listed acute hazardous waste codes could apply LQG status if >1 kg/month 	<ul style="list-style-type: none"> Any of 124 P-listed acute hazardous waste codes could apply LQG status if >1 kg/month
Training	<ul style="list-style-type: none"> None required for laboratory personnel Training required for personnel outside of SAA 	<ul style="list-style-type: none"> Training that is “commensurate with duties” is required for lab workers and students in labs Training required for personnel outside of lab (“trained professionals”)
Container management	<ul style="list-style-type: none"> Containers must be in good condition Contents must be compatible with container Containers must be kept closed except: <ul style="list-style-type: none"> When adding or removing waste 	<ul style="list-style-type: none"> Containers must be in good condition Contents must be compatible with container Containers must be kept closed except: <ul style="list-style-type: none"> When adding, removing, or consolidating unwanted materials Working containers may remain open until the end of shift or procedure, whichever is first When venting is necessary
On-site consolidation of containers	<ul style="list-style-type: none"> Transfer of containers between SAAs is not allowed, therefore on-site consolidation of containers may not occur without a 90/180 day area 	<ul style="list-style-type: none"> Transfer of containers between labs is allowed, therefore on-site consolidation of containers may occur without a 90/180 day area
Laboratory clean-outs	<ul style="list-style-type: none"> Maximum volumes are easily exceeded and excess volumes must be removed within 3 days Often results in an increase in generator status (episodic generation) 	Incentives provided to conduct clean-outs: (limited to once per lab per 12 months) <ul style="list-style-type: none"> 30 days to conduct a clean-out Do not have to count hazardous waste from a clean-out toward generator status if it is an UNUSED commercial chemical product (i.e., P- or U-listed, or characteristic)
Laboratory management plan (LMP)	<ul style="list-style-type: none"> Not required 	2-Part LMP required with 9 elements: <ul style="list-style-type: none"> Contents of Part I are enforceable <ul style="list-style-type: none"> 2 elements in Part I Contents of Part II are NOT enforceable <ul style="list-style-type: none"> 7 elements in Part II