

Lids, Leaks, Labels and Location

All About Satellite Accumulation

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Satellite Accumulation Rule!

- 40 CFR 262.34(c)(1)

A generator may accumulate as much as 55 gallons of hazardous waste or one quart of acutely hazardous waste listed in §261.33(e) in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or interim status and without complying with paragraph (a) {*accumulation time*} of this section provided he:

(i) Complies with Sections 265.171, 265.172 and 265.173(a) of this chapter; and

(ii) Marks his containers EITHER with the words “Hazardous Waste” OR with other words that identify the contents of the containers.

Satellite Accumulation Rule! cont...

- 40 CFR 262.34 (c)(2)

A generator who accumulates either hazardous waste or acutely hazardous waste listed in §261.31 or §261.33(e) in excess of the amounts listed in paragraph (c)(1) of this section at or near any point of generation must, with respect to that amount of excess waste, comply within three days with paragraph (a) of this section or other applicable provisions of this chapter. During the three day period the generator must continue to comply with paragraphs (c)(1)(i) and (ii) of this section. The generator must mark the container holding the excess accumulation of hazardous waste with the date the excess amount began accumulating.

Reference to 40 CFR 265.171,172 & 173(a)

- **265.171** Conditions of Containers. If a container holding a hazardous waste is not in good condition or if it begins to leak, the owner or operator must transfer the hazardous waste from this container to a container that is in good condition
- **265.172** Compatibility of Waste with Containers. The owner or operator must use a container made of or lined with materials which will not react with and are otherwise compatible with the hazardous waste to be stored, so that the ability of the container to contain the waste is not impaired.
- **265.173(a)** Management of Containers. (a) A container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.

LIDS

- Lids or caps must be securely in-place except when waste is being removed or added to the container.
- An open funnel resting on the mouth of a container does not constitute a lid.
- Lids or caps on waste containers must be tight.
- A good rule of thumb is: A CLOSED container, when tipped over, won't leak.
- Also reduces the exposure to vapors and fumes that may be produced.



LABELS

- The requirement states that the container must be marked with the words “Hazardous Waste” or words which identify the contents.
- A label or tag on the container is acceptable.
- Other acceptable wording for example is “Acetone Waste”, “Waste Paint” and “Spent Solvent Waste”.
- The key is that the label or mark must indicate that the material is a hazardous waste and not a raw material or product.



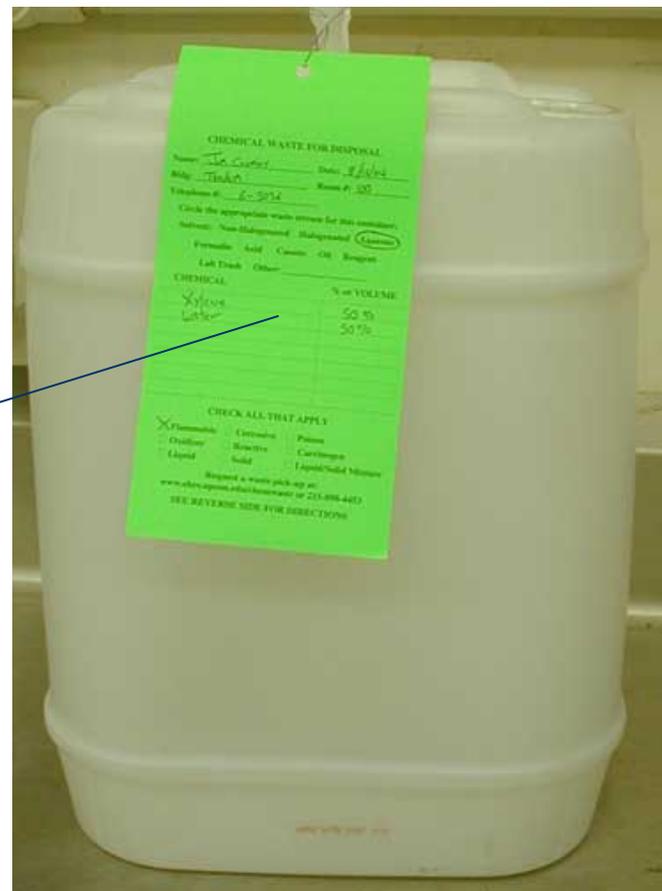
**NOT ACCEPTABLE...
NO MARKINGS ON THIS 55-
GALLON DRUM**



**NOT ACCEPTABLE...
PRODUCT LABEL DOES NOT SHOW
THAT DRUM CONTAINS WASTE**



ACCEPTABLE... WORDING AND LABELING



**TAGS SAYS:
CHEMICAL WASTE FOR DISPOSAL**
List of Chemicals and Volume
Characteristics such as:
Flammability
Corrosivity
Reactivity
Poison

CHEMICAL WASTE FOR DISPOSAL
Name: *John Carter* Date: *1/1/04*
Title: *Student* Room: *P-102*
Telephone #: *2-5034*
Circle the appropriate waste stream for this container:
Aqueous Non-Halogenated Halogenated Organic
Flammable Acid Corrosive Oxidizing
Lab Trash Other
CHEMICAL: *Xylene* % of VOLUME: *50%*
Water *50%*
CHECK ALL THAT APPLY
 Flammable Corrosive Poison
 Oxidizing Irritant Carcinogen
 Liquid Solid Liquid/Solid Mixture
Request a waste pick-up at:
www.wpi.edu/ehs/ehs/ehs.html or 214-893-4423
SEE REVERSE SIDE FOR DIRECTIONS

LEAKS

- Secondary Containment - recommended for the following containers in order to minimize the potential for breakage and to minimize the consequences in the event of breakage
 - Glass containers holding liquid hazardous waste kept on the floor.
 - Containers with capacity of less than 4 Liters, of liquid hazardous waste, regardless of storage location
- In general, secondary containment is to be used as a means of preventing incompatibles from interacting in the event of breakage and/or spillage. Hazardous waste are to be segregated by hazard class and stored in separate cabinets, trays, or pans.



**ACCEPTABLE...
SMALLER BOTTLES HELD IN
DRIP PANS.**



ACCEPTABLE SECONDARY CONTAINMENT OPTIONS



LOCATION

- The Satellite Accumulation Area (“SAA”) may NOT have more than 55-gallons per wastestream.
- The rule allows for several containers (per waste stream) in a SAA as long as the quantity limit does not exceed 55 gallons.
- Once it exceeds 55-gallons, the excess amount, in this case the container or containers that are full, must be dated. The container or containers can be kept at the SAA for an additional three days.
- After three consecutive days the container or containers must be moved to either a designated Hazardous Waste Storage Area on-site or shipped off-site for disposal.



**ACCEPTABLE LOCATION &
QUANTITY LIMITS for SAA**

Each 55-gallon drum represents a different waste stream. The drums were properly marked but two had open funnels & the 1-gallon bottles were NOT marked.

LOCATION cont..

- The SAA must be located at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste.
- Excerpts from the Revised Satellite Accumulation Policy:
 - The goal is that this temporary accumulation is performed responsibly and safely, with adequate oversight and control.
 - The applicability of the satellite accumulation provision will always depend upon a generator's particular set of circumstances, which are site-specific.
 - Therefore, any questions regarding specific wastes at specific facilities are best answered by the agency implementing the RCRA program for that particular facility.

INTERNET LINKS

Revised Position on Satellite Accumulation *(NJDEP Hazardous Waste C&E)*

<http://www.nj.gov/dep/enforcement/hw-satellite.pdf>

Frequently Asked Questions on Satellite Accumulation *(US EPA)*

[http://yosemite.epa.gov/osw/rcra.nsf/0c994248c239947e85256d090071175f/0AC9E15424B2897D8525770600609793/\\$file/14703.pdf](http://yosemite.epa.gov/osw/rcra.nsf/0c994248c239947e85256d090071175f/0AC9E15424B2897D8525770600609793/$file/14703.pdf)