

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:

- (i) Complies with § § **265.171, 265.172 & 265.173(a)** of this chapter; and
- (ii) Marks 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. Container used must be 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. 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.

**Funnel open and not in use.
Not Acceptable.**



01/20/2011



Containers that are part of the process ie. filter presses....



Can remain open as long as they are actively being filled or emptied



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**

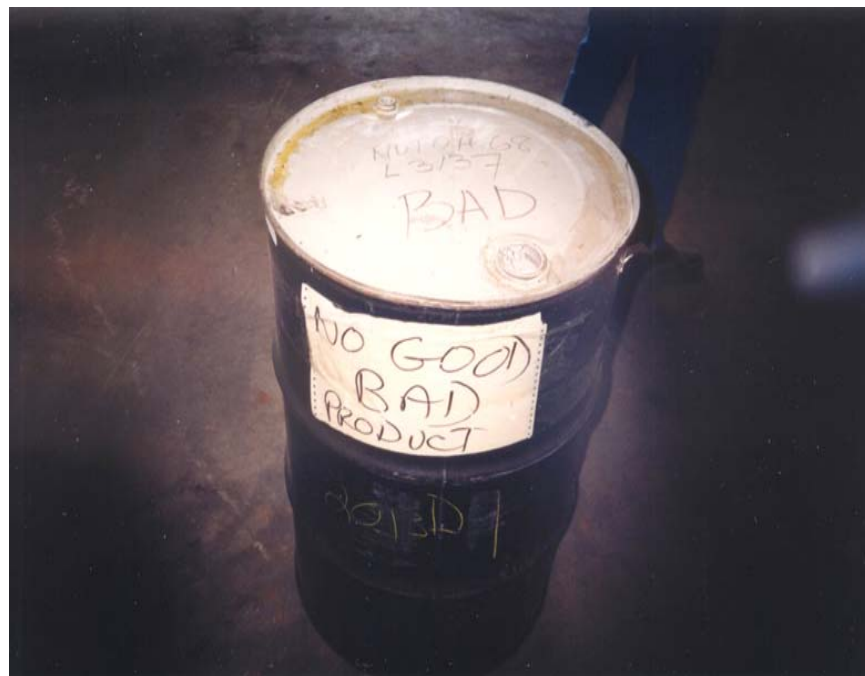


**NOT ACCEPTABLE...
PRODUCT LABEL DOES NOT SHOW
THAT DRUM CONTAINS WASTE**

**Bulb crusher -
Container needs to be
properly marked.**



**NOT
ACCEPTABLE**



HAZARDOUS WASTE
FEDERAL LAW PROHIBITS IMPROPER DISPOSAL.
 IF FOUND, CONTACT THE NEAREST POLICE, OR PUBLIC SAFETY AUTHORITY, OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY
 ALFRED UNIVERSITY - ENVIRONMENTAL HEALTH & SAFETY OFFICE - 1 SAXON DRIVE - ALFRED, NY 14802 - 607-871-2190
 EPA#

SATELLITE ACCUMULATION DATA
 BLDG. _____ RM. _____
 START DATE _____ FILL DATE _____ INT. _____
 CHEMICAL NAME: _____

WASTE CHARACTERISTIC: BY KNOWLEDGE TEST: poison/toxic flam. solvent oxidizer
 halogen solvent flam. solid corrosive acid corrosive base corrosive solid irritant

HAZARDOUS WASTE
FEDERAL LAW PROHIBITS IMPROPER DISPOSAL.
 IF FOUND, CONTACT THE NEAREST POLICE, PUBLIC SAFETY AUTHORITY, OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY
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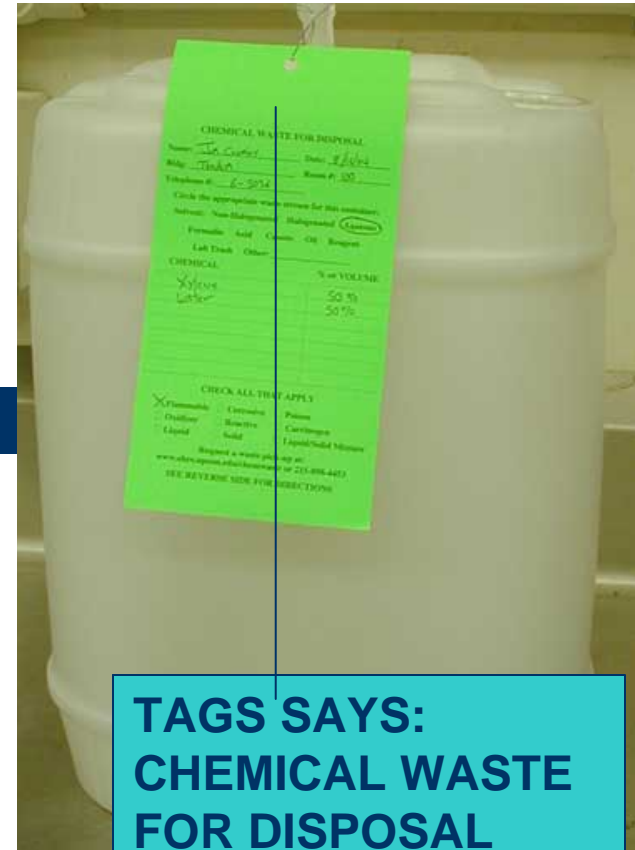
SATELLITE ACCUMULATION DATA
 BLDG. _____ RM. _____
 INIT _____ DATE: START _____ FULL _____

CONTENTS: CHEMICAL NAME/VOLUME OR WEIGHT

WASTE CHARACTERISTICS: TEST KNOWLEDGE
 poison/toxic flammable solvent oxidizer
 halogen solvent flammable solid corrosive acid
 corrosive base corrosive solid irritant

This section to be filled out at Central Accumulation area
CENTRAL ACCUMULATION DATA

Receipt Date _____ Initialed by _____



HAZARDOUS WASTE
 NAME OF WASTE WASTE OIL
 HAZARD(S) TOXIC
 DATE ACCUMULATION BEGAN _____
 HANDLE WITH CARE

HAZARDOUS WASTE
 NAME OF WASTE MATERIAL _____ DATE FILLED _____

ACCEPTABLE WORDING AND LABELING

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

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.

**NOT ACCEPTABLE:
Full 55-gallon drum
must be dated and
moved in 3 days**



05/18/2011

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.

Conveyance Containers

- No longer condones the use of a conveyance container (i.e. a laboratory safety can) to move or convey waste from an initial generation point (i.e. work station) to a container at a SAA.
- Conveyance container itself is **subject to SAA requirements**.
- Containers that are connected to laboratory apparatus or a piece of equipment, are not considered part of the process and are therefore **subject to SAA requirements**.

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)