

Requirements for Satellite Accumulation Areas

What is a satellite accumulation area (SAA)?

A SAA is a storage location at or near any point of generation where hazardous wastes initially accumulate, which is under the control of the operator of the process generating the waste. Wastes stored in these areas are subject to regulatory requirements and below are some key points that you should be aware of as Augusta University prepares for an EPA Self-Audit/Self-Reporting agreement signed by EPA and the Board of Regents (BOR) of the University System of Georgia (USG).

What Federal regulatory requirements apply to SAAs?

Federal regulatory requirements applicable to SAAs specify that up to 55 gallons of non-acutely hazardous waste (non P-waste) or one quart of P-waste may accumulate and be stored in a satellite area. These wastes may be stored in SAAs indefinitely without a permit, if the following provisions on container use, management, and labeling are met:

- The wastes must be placed in containers that are in good condition. If a container holding hazardous waste begins to leak, the waste must be transferred to a container that is in good condition.
- The wastes must be compatible with their containers, i.e., containers storing hazardous waste must be made of, or lined with, materials that will not react with and are otherwise compatible with the hazardous waste being stored, so that the ability of the containers to contain the wastes is not impaired.
- The containers holding the waste must always be closed securely during storage, except when it is necessary to add or remove waste so that container would not leak if it is tipped over.
- Containers in SAAs must be marked with the words “Hazardous Waste” and with information identifying the contents of the containers.
- Containers used to collect hazardous waste discharges from instruments such as GCs, GC/MS’ and HPLCs should be treated similarly with respect to waste compatibility with the container, container in good condition, container labeled with the words, “Hazardous Waste” and container kept closed securely except when adding or removing waste.
- Note that containers used to store hazardous waste should NOT be dated while they are in SAAs.

The Augusta University Chemical Safety Guide policy states that containers in SAAs MUST have secondary containment capable of containing the volume of the largest container.

Must a SAA be located within a certain distance of or within the same structure as the process generating the waste?

The provisions of the regulation require that a SAA be “*at or near the point of generation where wastes initially accumulate*” and “*under the control of the operator of the process generating the waste*”. If you take waste from where it is generated through a door to where you are accumulating it, EPA will describe this as not at or near the point of generation.

Are there requirements for the type, size, or number of containers used to store wastes; the types of wastes stored; the time that wastes may be stored; or the labeling, marking, or designation of SAAs?

EPA does not specify the type, size, or number of containers that may be used to accumulate waste in a SAA. A container storing waste in a SAA may be “any portable device in which a material is stored, transported, treated, disposed of, or otherwise handled”. While generators are not limited with respect to the number or size of containers in a SAA, they are responsible for ensuring that the waste quantity limitations described above (i.e., 55 gallons of non-acutely hazardous waste or one quart of acutely-hazardous waste) are not exceeded, and that each container is labeled with the words, “Hazardous Waste” and information identifying the contents of the containers.

EPA does not put any restrictions on the types of waste that may be stored in SAAs or on the amount of time that wastes may be stored in these areas. The Augusta University Chemical Safety Guide states that incompatible wastes should be stored separately.

Can a generator exceed the 55-gallon or one-quart limits when several waste streams are accumulated in a SAA?

No. The quantity limits apply to the total quantity of hazardous waste accumulated at a SAA. No more than 55 gallons of non-acutely hazardous waste or one quart of acutely hazardous waste may be accumulated in a single SAA.

If a facility has multiple SAAs, can hazardous wastes be moved from one to another?

No. If a waste leaves a SAA, it must be destined for a 180-day storage area which is managed by the Chemical Safety Office staff.