Purpose

The purpose of this document is to provide compliance assistance to Virginia facilities that manage hazardous waste in satellite accumulation areas (SAAs) to meet the Virginia Hazardous Waste Management Regulations (VHWMR) for hazardous waste generators. The information in this document does not apply to persons generating household hazardous waste as defined in 40 CFR § 261.4(b)(1).

This information is provided for compliance assistance purposes only by Department of Environmental Quality (DEQ). This is not a regulation and, therefore, does not add, eliminate, or change any existing regulatory requirements. The statements in this document are intended for informational purposes only.

Discussion

What is Satellite Accumulation?

Satellite accumulation is addressed in 40 CFR § 262.15 (previously 262.34 (c)) of the VHWMR (as incorporated by reference). Satellite accumulation is temporary accumulation of restricted amounts of hazardous waste by Large Quantity Generators (LQGs) and Small Quantity Generators (SQGs) at or near the point of initial generation and under the control of the operation. SAAs allow LQGs and SQGs to accumulate hazardous wastes for longer periods of time than would be allowed at a Central Accumulation. SAAs were intended for use in areas of hazardous waste generation where the generation rate is so slow that a full drum may not be accumulated within 90 or 180 days, as applicable, or where moving wastes immediately upon generation to a central accumulation is not practicable.

Components of Satellite Accumulation Area Regulations

SAA Waste Accumulation

Waste Determination and Accumulation

In accordance with 40 CFR § 262.11, anyone who generates a solid waste is required to determine if that waste is a hazardous waste. Also, large quantity generators (LQGs) are allowed to accumulate hazardous waste on-site for up to 90-days and small quantity generators (SQG) have up to 180 days without a permit or interim status.

Because the operator of a satellite accumulation container should be familiar with the process generating the waste, and should know the contents of the waste generated in his process area, unknown wastes would not be expected in a satellite accumulation area.

Amount and Limits

SAAs can be used to manage no more than 55 gallons of non-acute hazardous waste and/or 1 kilogram solid (or 1 quart liquid) of acute hazardous waste at any one time as stated in 40 CFR § 262.15 (a).

Multiple container management (i.e., several smaller containers for multiple waste streams) may be used that do not exceed a total of 55 gallons of hazardous waste (and/or 1 quart of acutely hazardous waste) for "one" satellite area.
**Excess Waste Requirements for SAA**

Once the 55 gallons of non-acute hazardous waste and/or 1 kilogram solid (or 1 quart liquid) of acute waste is exceeded, the generator must date the excess and remove the excess within three (3) consecutive calendar days. The excess waste must be moved to the central accumulation area (the 90-day for LQGs or 180-day for SQGs accumulation area).

The generator must date the container again, so that it can be moved off-site within 90 or 180 days. Waste may not be transferred from one satellite accumulation area to another satellite accumulation area.

**SAA Location and Procedures**

**SAA Location**

Satellite accumulation area must be “at or near the point of generation” and the waste must be “under the control of the operator of the process generating the waste” as described in 40 CFR § 262.15 (a)(4)(ii).

Because processes that generate wastes and the layouts of facilities where these wastes are generated can vary, the determination of “at or near” and “under the control of the operator” will be evaluated by DEQ on a generator-by-generator and SAA-by-SAA basis.

A waste accumulation container immediately outside the room where it is generated could meet the satellite accumulation criteria. Some cases that may not meet satellite accumulation criteria include when the accumulation container is at a distance or in a location where transfer of the waste from the point of generation would be difficult and could result in spills, or when the location of the SAA is not routinely within the control of the operator of the process.

**Preparedness, Prevention and Emergency Procedures for SAA**

All satellite accumulation areas operated by SQGs must meet the Preparedness and Prevention regulations of 40 CFR § 262.16(b)(8) and Emergency Procedures of 40 CFR § 262.16(b)(9).

All satellite accumulation areas operated by LQGs must meet the Preparedness, Prevention and Emergency Procedures in Subpart M of 40 CFR § 262. These requirements are clarifications to what currently occurs and generators should work with their local emergency responders to determine what, if any, actually has to be modified to comply with this provision.

**SAA Containers**

**Container Handling**

In an SAA, close all containers except when adding, removing waste, or consolidating waste as described in 40 CFR § 262.15 (a)(5)(ii)(2). Temporary venting of a container may occur as necessary for the proper operation of equipment, or to prevent dangerous situations, such as build-up of extreme pressure as described in 40 CFR § 262.15(a)(4)(ii). This is a new provision.

**Container Marking and Labeling**

Containers in SAAs must be marked with the words "Hazardous Waste" as well as an indication of the hazards of the contents as described in 40 CFR § 262.15 (a)(3). Previously SAA containers
were allowed to be labeled with “other words to describe the contents.” This is no longer allowed.

Hazards of the contents to be placed on the label can be the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation (DOT) requirements stated in 49 CFR § 172 Subpart E (labeling) or 49 CFR § 172 Subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard stated in 29 CFR § 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association Code 704 as stated in 40 CFR § 262.15(a)(5)(ii). This is designed to communicate the risks to workers, waste handlers and emergency responders.

**Container and Waste Compatibility**

Containers of incompatible waste at SAAs must be segregated, but total volume/weight restrictions for an SAA cannot be exceeded. Ensure waste is compatible with other wastes in the container and the type of containers as described in 40 CFR § 262.15 (a)(1-2). Incompatible wastes, or incompatible wastes and materials (examples provided in Appendix V of 40 CFR § 265) must not be placed in the same container, unless it complies with 40 CFR § 265.17(b).

Hazardous waste must not be placed in an unwashed container that previously held an incompatible waste or material (examples provided in Appendix V of 40 CFR § 265), unless it complies with 40 CFR § 265.17(b).

A container holding a hazardous waste that is incompatible with any waste or other materials accumulated nearby in other containers must be separated from the other materials or protected from them by any practical means as described in 40 CFR § 262.15(a)(3).

Similarly, the generator must use a container made of or lined with materials that will not react with, and is otherwise compatible with, the hazardous waste to be accumulated, so that the ability of the container to contain the waste is not impaired 40 CFR § 262.15 (a)(1-2).

**SAA Waste Cleanup and Container Condition**

Immediately transfer waste from a leaking container to a container in good condition or immediately transfer the waste and manage it in the central accumulation area.

**For More Information**

Please contact the appropriate DEQ regional staff if you have any questions regarding applicability of these requirements to your facility.