

TIP No. 37-110-0722

## Hazardous Waste Accumulation Area Management

---

The following is based on Federal criteria within the Environmental Protection Agency's New Generator Rule (Title 40 Code of Federal Regulation (CFR) Part 262.1-18, .250-.265). State and local regulations may be more stringent.

**Satellite Accumulation Area:** An accumulation and storage area at or near the waste generating process and is under the direct supervision or control of the operator of the generating process (40 CFR 262.15(a)). No permits are required for this type of storage. The generator may accumulate up to a total of 55 gallons of non-acute hazardous waste (HW) and/or up to a total of 1 quart of liquid (or 1 kilogram of solid) acute HW with no constraints on storage time (40 CFR 262.15(a)). Any amount of waste over the 55 gallon or 1 quart/kg limit must be dated with the accumulation start date (the date when the excess started accumulating) and transferred to a central accumulation area within three consecutive calendar days (40 CFR 262.15(a)(6)(ii)(A)).

The waste must be accumulated in containers that are in good condition and compatible with the waste (40 CFR 262.15(a)(1) and (2)). When no waste is being transferred into or out of the container, it must be closed (i.e., lids, caps, and bungs must be in place) (40 CFR 262.15(a)(4)). If storing flammable waste in a container of greater than 1-gallon capacity, the container must be constructed of metal (29 CFR 1910.106 (d) Table H-12), unless the glass or plastic containers are the industry standard for storing that chemical AND the container is Department of Transportation (DOT) approved for shipping that chemical (Occupational Safety and Health Administration (OSHA) Instruction Standard (STD) 01-05-014, October 24 1980). Containers of incompatible wastes must be separated by any practical means (40 CFR 262.15(a)(3)(iii)).

A label must be placed on the container with the words "Hazardous Waste" AND an indication of the hazard(s) of the waste (i.e., if ignitable or corrosive, use DOT label (49 CFR 172 subpart E), or OSHA Hazard Communication Standard (29 CFR 1910.1200 pictogram) (40 CFR 262.15(a)(5)).

**Recommendations:** Coordinate the setup and management of this accumulation and storage area with the installation environmental office. Place the HW container(s) in secondary containment as a precaution especially if you are accumulating incompatible wastes. Placing the waste back into its original container assures that the proper container is used for that waste. Make sure the waste is removed from this area before the storage capacity is reached. Remember that the disposal process is not instantaneous and it could take longer than the allowable time period to have any excess waste removed. It is a good idea to perform and document periodic inspections of the accumulation area to ensure there are no leaks or spills, the containers are closed, and properly labeled. Keep a copy of the quick response guide (see Preparedness and Prevention) at each satellite accumulation area.

---

**Approved for public release; distribution unlimited**

**The mention of any non-federal entity and/or its products is not to be construed or interpreted, in any manner, as federal endorsement of that non-federal entity or its products.**

**Central Accumulation and Storage Area:** An HW storage area removed from the generating process but still on the facility property. No permits are required for this type of storage area. Any amount of HW may be stored here but each container of waste must be removed within 90 days. Waste stored in this area must be in containers that are in good condition and compatible with the contents of the container (40 CFR 262.17(a)(1)). If storing flammable waste in a container of greater than 1-gallon capacity, the container must be constructed of metal (29 CFR 1910.106 (d) Table H-12), unless the glass or plastic containers are the industry standard for storing that chemical AND the container must be DOT approved for shipping that chemical (OSHA Instruction STD 01-05-014, October 24, 1980). If you are storing incompatible wastes, they must be separated from the other materials or protected from them by means of a dike, berm, wall, or other device (40 CFR 262.17(a)(1)(vii)(C)).

The container must have a properly filled out HW label on it that includes the words "Hazardous Waste," the identity of the contents, the accumulation start date, and indications of the hazard(s) of the waste (i.e., ignitable, corrosive, reactive, etc., DOT label/placard (49 CFR 172 subpart E), or OSHA Hazard Communication Standard (29 CFR 1910.1200.C.2.3.1 pictogram) (40 CFR 262.17(a)(5)(i)). The accumulation start date begins either when the first drop enters the container or when a container is brought to the storage area. Weekly inspection of the storage area to look for deteriorated or leaking containers or conditions that cause deterioration must be made and documented (40 CFR 262.17(a)(1)(v)). Records must be maintained for 3 years.

All employees working at a central accumulation area must have documented HW training. At a minimum, the training program must be designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems. Documentation of this training includes:

- A job title for each employee with HW management duties;
- A written job description for each of the aforementioned employees; and
- A written training plan for each employee with HW duties, to include the type and amount of initial and continuing training that will be given to each employee with HW duties (40 CFR 262.17(a)(7)).

Training records for current employees must be kept until the closure of the storage area. Records of former employees must be kept for at least 3 years after the employee has left (40 CFR 262.17(a)(7)(v)).

When this storage area is no longer used as a central accumulation site, the site must undergo closure procedures (40 CFR 262.17(a)(8)(iii)).

**Recommendations:** Place the containers on a secondary spill containment device such as a spill tray. This will help keep incompatible wastes separated. Keep a binder at the storage site with copies of the spill contingency plan, weekly inspection records, any operational SOPs, and personnel records to include job titles, job descriptions, and training records for each employee working at the central storage site. Many installations also require an HW inventory for central accumulation area sites. Keep these in the site binder for easy access.

**Preparedness and Prevention (Satellite and Central Accumulation):** Satellite Accumulation Areas and Central Accumulation Areas of large quantity generators ( $\geq 1,000$  kg/month non-acute HW or  $\geq 1$  quart/kg month of acute HW) must meet the requirements of 40 CFR Part 262 Subpart M (40 CFR 262.250-.265) Preparedness, Prevention, and Emergency Procedures for Large Quantity Generators.

**Required Equipment:** Areas must maintain adequate aisle space to allow unobstructed movement of personnel, fire equipment, spill control equipment, and decontamination equipment (40 CFR 262.255). The areas must have an internal communications or alarm system; a two-way communications device; fire control devices suitable for the wastes stored in that area; spill control equipment; decontamination equipment; and sufficient water to support hose streams or an automatic sprinkler system (40 CFR 262.252).

**Contingency Plan and Quick Reference Guide:** Satellite Accumulation Areas and Central Accumulation Areas of large quantity generators must maintain a site-specific contingency plan and quick reference guide. Contingency plans must list the names and phone numbers of emergency personnel, emergency equipment on site, and contain an evacuation plan. Quick reference guides must list the name of each HW in layman's terms, the hazard of each waste, estimated maximum quantity, site map where the HW is generated, location of water supply, street map of the facility in relation to surroundings, identify alarm systems, and names and phone numbers of emergency coordinators. Also provide copies of the contingency plans and the quick reference guides to local emergency responders (40 CFR 262.15 (8), 261.262, 262.262). Update this information at least annually or when personnel or conditions change.

**Emergency Coordinator:** At all times an employee must be on site or on call to coordinate emergency response measures and implement emergency procedures (40 CFR 262.264).

**Point of Contact:** Please contact the Environmental Health Sciences Division, Waste Management Branch at 410-436-3651 or DSN 584-3651 for additional information.