



UTAH DEPARTMENT of  
ENVIRONMENTAL QUALITY  
**WASTE MANAGEMENT  
& RADIATION CONTROL**

# Satellite Accumulation Area (SAA) Guidance Document

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## **INTRODUCTION**

The purpose of this guidance is to address questions we have received about management of hazardous wastes under the Utah Administrative Code R315-262-15, commonly called satellite accumulation area (SAA) regulations.

This guidance is intended to be used and applied by hazardous waste generators and inspectors to improve their understanding and compliance with the satellite accumulation requirements.

### **WHAT IS THE PURPOSE OF SATELLITE ACCUMULATION REGULATIONS?**

In the December 20, 1984, Federal Register, 49568 U.S. EPA stated that satellite accumulation is intended for industries who generate small amounts of hazardous waste in one or more locations at a facility. The rule defines the following acute hazardous and non-acute hazardous waste limits per satellite accumulation area:

**Table 1.** Satellite Accumulation Area (SAA) non-acute hazardous waste and acute hazardous waste limits.

<b>Waste Type</b>	<b>SAA Limit</b>
Non-Acute Hazardous Waste	≤55 Gallons
Liquid Acute Hazardous Waste*	≤1 quart
Solid Acute Hazardous Waste*	≤1 kg (2.2 lbs)

\* The accumulation limits for acute hazardous wastes are not intended to be additive; so, in cases where a generator has both liquid and solid acute hazardous waste accumulating in a satellite accumulation area, the 1-kg (2.2-lb) limit will apply. [81 *FR* 85765]

A satellite accumulation area allows a generator to manage their hazardous waste in containers at or near the point of generation, without a permit or complying to stricter central accumulation area (CAA) requirements if all conditions in R315-262-15 UAC are met. For generators, it is also a cost saving measure that allows them to accumulate a maximum amount of waste (Table 1) over an extended time frame, rather than being required to dispose of half empty containers following the 90/180/270-day CAA time frames (R315-262-16(b) or R315-262-17(a) UAC).

### **WHAT ARE SOME OF THE REQUIREMENTS FOR SATELLITE ACCUMULATION?**

When you accumulate a hazardous waste at or near the point of generation in a SAA, you must comply with the following requirements:

1. Mark your containers with the words “**Hazardous Waste**” and an **Indication of the Hazards** of the contents (e.g., the applicable hazardous waste characteristic(s), hazard pictogram consistent with Occupational Safety and Health Administration (OSHA) Hazard Communication Standard at 29 CFR 1910.1200, chemical hazard label consistent with National Fire Protection Association (NFPA) code 704).
2. Keep hazardous waste containers closed unless you are adding or removing waste or temporary venting of the container is needed (e.g., to prevent dangerous conditions).
3. All hazardous waste containers must be in good condition. If the container being used to accumulate hazardous waste is not in good condition, or if it begins to leak, you must transfer the contents to a container that is in good condition.
4. The containers you use to accumulate hazardous waste must be compatible with the waste or lined with a material which will not react with the hazardous waste being accumulated.
5. Incompatible wastes must not be mixed in the same container.
6. A container accumulating hazardous waste that is incompatible with any waste or other materials accumulated or stored nearby in other containers, piles, open tanks, or surface

impoundments must be separated from the other materials or protected from them to prevent possible mixing by means of a dike, berm, wall, or other device.

7. When acute hazardous or non-acute hazardous waste in a SAA exceeds the SAA limits (Table 1), the generator must:
  - a. Date the container of waste.
  - b. Remove the excess from the SAA within **three consecutive calendar** days to either a CAA or off-site to a designated facility.

### ***UNDER WHAT CIRCUMSTANCES CAN HAZARDOUS WASTE BE ACCUMULATED IN A SATELLITE ACCUMULATION AREA?***

You can accumulate hazardous waste under the reduced requirements for satellite accumulation at or near the point of generation. The hazardous waste must be under the control of the person who is operating the process that generates the waste. There is no limit on how long you can accumulate the hazardous waste at or near the point of generation as long as you accumulate no more than the SAA limits for each SAA (Table 1).

### ***WHAT IS “AT OR NEAR” THE POINT OF GENERATION?***

“At or near” is not designated by any specific distance and is determined on a case-by-case basis at the discretion of the Division. When evaluating if your situation meets the requirement to be “at or near the point of generation,” we consider the type of hazard posed by the hazardous waste being accumulated, the physical controls in place where the waste is accumulated, and the amount and type of training provided to the operator who is in control of the process generating the waste.

Your facility may have special situations that make locating the waste at or near the point of generation impractical. This could include instances such as a SAA maintained outside a clean-room production area for quality control purposes or placing the SAA immediately outside an enclosed paint booth area for safety reasons. Contact the Division of Waste Management and Radiation Control (DWMRC) for guidance under these types of circumstances.

### ***WHAT DO WE MEAN BY “UNDER THE CONTROL OF THE OPERATOR”?***

The purpose of this requirement is to prevent combining incompatible wastes and to prevent untrained individuals from coming into contact with the hazardous waste. You must be able to demonstrate that personnel responsible for generating and accumulating the waste have adequate control over the temporary accumulation and knowledge of the hazards associated with the waste. The operator may include several different individuals generating the waste or just one. An operator who maintains their SAA in sight during their work shift has the waste under their control. If keeping the SAA in sight is not possible, the SAA must be locked in a cabinet, room or other equivalent mechanism that is compatible with the type of waste to limit unauthorized access to the waste. In this case, the SAA should be inspected daily by the operator.

### ***IS SATELLITE ACCUMULATION LIMITED TO ONE WASTE STREAM?***

There is no limit to the number of satellite accumulation containers in a specific SAA in your facility. You may accumulate multiple waste streams as long as you ensure that the waste is being managed in accordance with the requirements specified in R315-262-15 UAC for satellite accumulation for each waste stream.

### ***CAN MULTIPLE SATELLITE ACCUMULATION CONTAINERS BE IN CLOSE PROXIMITY TO ONE ANOTHER?***

You may have multiple satellite accumulation containers in close proximity to one another as long as each SAA is under the control of the operator(s) of the process generating the waste, and the wastes are compatible.

Satellite accumulation containers holding hazardous waste that is incompatible with any waste or other material stored nearby in other containers, tanks or storage devices must be segregated from the other wastes or materials by a dike, berm, wall, or other proper mechanism.

### ***WHAT IS “IN-PROCESS” WASTE AND DOES IT NEED TO BE MANAGED AS SATELLITE ACCUMULATION?***

In-process waste refers to waste that is continuously generated and is an integral part of the system generating the waste or waste that is accumulated during a process and is moved to a SAA or central accumulation area at the end of each operator’s work shift. “Integral to the process” is the primary condition for in-process waste and may include a hard-piped container or other physical connection. However, physical connection is not a required condition. In-process waste containers should be properly labeled with an indication of the hazard.

### ***EXAMPLES OF IN-PROCESS WASTE SCENARIOS***

1. A container for waste generated by a High-Performance Liquid Chromatography (HPLC) which is physically connected to the HPLC, where the discharge line feeds directly into the solvent container. To be considered “in-process” the container must be emptied into a SAA or CAA at the end of the work shift by the operator. If the solvent container is not emptied at the end of the work shift, it is a SAA and is subject to the SAA requirements.
2. A group of employees working at the same bench, cleaning equipment with listed solvents on a cotton swab. Each employee has a one-quart collection container for used cotton swabs at their workstation. At the end of the work shift, the employees consolidate their one-quart containers of used cotton swabs in a 55-gallon container located at the end of the work bench. In this example, the one-quart containers are considered a collection point for “in-process” waste and the 55-gallon container is considered a satellite accumulation area. If the one-quart containers are not moved to the SAA by the end of the work shift, each one-quart container becomes subject to the SAA requirements.

### ***CONTACTS***

Please contact the Division of Waste Management and Radiation Control (DWMRC) hazardous waste section with any questions at 801-536-0200.