

## Chapter 4

### SETTING UP STORAGE AREAS FOR HAZARDOUS WASTE

Because federal and state regulations require that all hazardous waste be shipped off-site within specific time limits, these wastes can be accumulated on-site for only a limited amount of time. In addition, the ORARNG has increased this requirement by adding other types of non-hazardous waste that must be treated like regulated waste.

Some wastes are initially accumulated at Satellite Accumulation Areas (SAA). Then they are moved to a Hazardous Waste Accumulation Area (HWAA).

#### 1. SATELLITE ACCUMULATION AREAS

a. A SAA is a location at or near a process generating hazardous waste where you can accumulate up to 55 gallons of HW and up to one quart of P-listed acutely HW. Once this limit is reached, you must mark the Accumulation Start Date (ASD) on the container and move it to the HWAA within 72 hours (including weekends and holidays).

#### WARNING

*DO NOT use a SAA to accumulate waste from multiple operating areas, even areas within the same shop.  
DO NOT mix multiple wastes in the same container.*

b. A SAA must be under the control of the operator of the process that generates the waste. "Under control" means that the person controls what waste is put into the SAA container.

#### 2. SETTING UP AND MAINTAINING A SAA

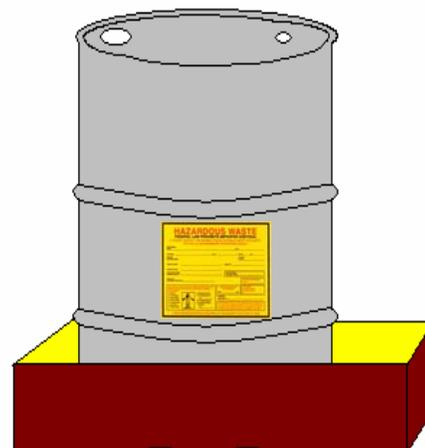
**STEP 1.** Select a site that is --

- ◆ Well-ventilated, if indoors
- ◆ Under cover and fenced or otherwise secure, if outdoors
- ◆ Near the process generating the waste

*Locate SAAs that contain ignitable or reactive wastes at least 50 feet inside the property boundary.*

**STEP 2.** Plug floor drains within 50 feet that do not have oil/water separators.

**STEP 3.** Select fire extinguishers that are compatible with the type of potential fire hazard present, and place them no less than 10 feet from the SAA.



**STEP 4.** Post warning signs in visible locations at the site. The signs must be readable from 50 feet away and contain the following information:



Other required sign is: **NFPA (704)**

**WARNING!**  
*Keep containers with liquid wastes within secondary containment,  
 such as dikes, curbs, or spill pallets.  
 Segregate incompatible wastes with berms, curbs, walls, spill pallets,  
 or other physical devices.*

**STEP 5.** Mark the container either with the words "HAZARDOUS WASTE" or with other words that identify the contents of the container.

**STEP 6.** Ensure that containers have a corresponding HW Determination Worksheet filled out IAW the Waste Protocol Sheets (WPS).

*See the How is Waste Accumulated section of Chapter 5 for  
 information about using WPSs.*

**STEP 7.** Conduct weekly inspections IAW Chapter 7.

**STEP 8.** Do not exceed 55 gallons of HW or 1 quart of acutely HW in the SAA.

### **3. HAZARDOUS WASTE ACCUMULATION AREA**

All ORARNG activities must set up a central management location called a HWAA if they generate any HW.

*An EPA Generator ID# is based on geographic location not by unit activities.  
 Ensure that the combined total of waste for all activities does not exceed the maximum quantity*

*limitations identified in Chapter 5 paragraph 2.*

#### **4. SETTING UP A HAZARDOUS WASTE ACCUMULATION AREA**

**STEP 1.** Select a well-ventilated site indoors or a site outdoors that is under cover and fenced or otherwise secured to prevent unauthorized access.

**CAUTION!**

*Locate HWAAAs that contain ignitable or reactive wastes  
at least 50 feet inside the property boundary.*

**STEP 2.** Plug floor drains within 50 feet that do not have oil/water separators.

**STEP 3.** Select fire extinguishes that are compatible with the types of potential fire hazards present and place them so they are visible from the front entrance.

Coordinate with the State Safety Office (SAO) for the proper type and location of extinguishers.

**STEP 4.** Post warning signs in visible locations at the site. The signs must be readable from 50 feet away and contain the following information:

<b>HAZARDOUS WASTE ACCUMULATION AREA</b>	
UNAUTHORIZED PERSONNEL KEEP OUT	
<hr/>	
<i>HWAA MANAGER</i>	
Primary:	Tel:
Alternate:	Tel:
Emergency (Fire Department) Telephone Number - "911"	
<b>DANGER KEEP FIRE AND FLAME AWAY</b>	
<b>NO SMOKING</b>	
<b>WITHIN 50 FEET</b>	

Other required sign is: **NFPA (704)**

**STEP 5.** Place enough spill response equipment nearby to contain a spill.

**WARNING!**

*Keep containers with liquid wastes within secondary containment,  
such as dikes, curbs, or spill pallets.*

*Segregate incompatible wastes with berms, curbs, walls, spill pallets, or other physical devices.*

## **5. MAINTAINING A HAZARDOUS WASTE ACCUMULATION AREA**

**STEP 1.** Position container(s) so the wastestream name is clearly visible and there is enough room between containers (usually 3 feet) to conduct inspections.

**STEP 2.** Ensure that container HW labels are filled out according to step 2 of the Waste Protocol Sheets (WPS) in chapter 5, and that all UW and HW containers have ASDs.

**STEP 3.** Ensure that incompatible wastes are segregated IAW Chapter 3.

**STEP 4.** Ensure that containers have HW Determination Worksheet filled out IAW the WPSs.

**STEP 5.** Conduct weekly inspections IAW Chapter 7.

*See the Using Waste Protocol Sheets section of Chapter 5 for information about using WPSs.*

**THIS  
SATELLITE ACCUMULATION AREA  
ACCEPTS HAZARDOUS WASTE  
ONLY  
IF GENERATED BY**

---

**SAA MANAGER**

**Primary:**

**Tel:**

**Alternate:**

**Tel:**

**Emergency (Fire Department) Telephone Number - "911"**

**DANGER KEEP FIRE AND FLAME AWAY**

**NO SMOKING**

**WITHIN 50 FEET**

# **HAZARDOUS WASTE ACCUMULATION AREA**

**UNAUTHORIZED PERSONNEL KEEP OUT**

---

## **HWAA MANAGER**

**Primary:**

**Tel:**

**Alternate:**

**Tel:**

**Emergency (Fire Department) Telephone Number - "911"**

**DANGER KEEP FIRE AND FLAME AWAY**

**NO SMOKING**

**WITHIN 50 FEET**