



PROGRAM HIGHLIGHTS – For Businesses – A Guide

Fact Sheet No. HWMB97-4((05/09)

SATELLITE ACCUMULATION – For Hazardous Waste Generators

1. What is a satellite accumulation area?

As stated in Federal Register Volume 49, No. 246, dated 12/20/84, “*Satellite areas are those places where wastes are generated in the industrial process or the laboratory and where those wastes **must** (emphasis added) initially accumulate prior to removal to a central location.*” Thus, in order to have a full container of hazardous waste for more economical offsite shipment, a generator may have a satellite area to accumulate small quantities of hazardous waste which are generated over a long period of time. Satellite areas may not be used as a mechanism to extend or circumvent hazardous waste accumulation timeframes, nor may they be used if accumulating waste at or near the point of generation is unnecessary to the process or operation generating the waste.

2. Does Delaware allow generators to conduct satellite accumulation?

Yes. Delaware’s *Regulations Governing Hazardous Waste (DRGHW)*, §262.34(c)(1) state in part, “*A generator may accumulate as much as 55 gallons of hazardous waste or one quart of acutely hazardous waste listed in §263.33(e) in containers at or near the point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste...*”. When done correctly, containers used in such a manner are designated as satellite accumulation containers.

3. Are Delaware’s requirements more stringent than the federal requirements in the Code of Federal Regulations (CFR)?

Yes. Delaware’s regulations are more stringent than those at the federal level. While federally a generator has 72 hours before moving any satellite accumulation amount in excess of 55 gallons of hazardous waste or one quart of acutely hazardous waste to the site’s accumulation area, the DRGHW require generators move excess amounts immediately.

4. What is meant by the point of generation?

A “point of generation” is the place in the process where hazardous waste is first generated. A company may maintain satellite areas throughout a plant site if there are many points of generation. For example, hazardous waste contaminated personal protective equipment (PPE) is considered generated at the point it is removed from the body. If a plant site has many locations where PPE is removed, there may be multiple satellite accumulation locations for this waste.

5. What is meant by “at or near the point of generation”?

At or near the point of generation means be in the immediate area of the process generating the waste and in the direct view and easy reach of the operator. Although the Solid Hazardous Waste Management Branch has not designated a distance value, waste which is placed in a room other than where it is generated is not considered to be in a satellite area. Waste placed in an area immediately adjacent to the process, but not readily visible to the operator is also not considered a satellite accumulation area. In those circumstances where a satellite accumulation container cannot, due to space or safety concerns, be located at or near the point of generation, the generator must either opt to accumulate lesser amounts in the satellite area or manage the area as a hazardous waste accumulation area in accordance with the requirements of the DRGHW, §§ 262.34(a) and 262.34 (d).

6. What are the requirements for managing a satellite accumulation container?

Satellite accumulation requirements are detailed in DRGHW, §262.34(c). In brief, satellite accumulation containers must be labeled with the words “Hazardous Waste” or have the contents otherwise identified as waste (i.e., “waste Solvents, “Waste Acids.”) Satellite containers are to be closed unless waste is being added. The containers must be compatible with the waste within and maintained in good condition. When accumulations exceed 55 gallons of hazardous waste or one quart of acutely hazardous waste, containers must be immediately dated and moved to the site’s accumulation areas.

7. Are there provisions for satellite accumulation of hazardous wastes generated throughout a site?

Yes, but only in cases of maintenance activities. For example, it would be impractical to establish a satellite accumulation area at the point of generation for hazardous waste fluorescent lamps. Thus, spent hazardous waste fluorescent lamps may be satellite accumulated in a maintenance or similar type of shop location provided they are under the control of personnel responsible for lamp replacement. In a building with multiple maintenance or similar type shops, the satellite accumulation of fluorescent lamps is permitted in one location only. The same is true of paint wastes generated via preventive maintenance. As small quantities of paint waste are generated throughout a plant site, one satellite accumulation area in the maintenance shop may be provided for hazardous waste paint wastes.

8. How many times may a waste be placed into a satellite accumulation container?

Once. For example, you are prohibited from designating multiple containers as satellite areas and pouring or otherwise transferring waste from one container to another. Thus, you cannot have a five gallon satellite accumulation container on a benchtop, and at week’s end pour that accumulated waste into a ten gallon satellite accumulation container at the foot of the bench and then pour that accumulated waste into a 55 gallon container maintained elsewhere in the laboratory.

If you have any questions, do not hesitate to contact the Solid and Hazardous Waste Management Branch at 302.739.9403.