

Satellite Accumulation Area Guidance

NOTE: This document is not a substitute for state rules and federal regulations. Hazardous waste generators must comply with all applicable provisions in the Arizona Hazardous Waste Management Act, [Arizona Administrative Code \(AAC\) Title 18, Chapter 8](#) and [Arizona Revised Statutes \(ARS\) Title 49, Chapter 5](#), and federal hazardous waste regulations, [40 Code of Federal Regulations \(CFR\) Parts 260 to 273](#).

Small quantity generators (SQGs) and large quantity generators (LQGs) of hazardous waste must comply with Resource Conservation and Recovery Act (RCRA) requirements for maintaining satellite accumulation areas (SAAs). Following federal requirements ([40 CFR § 262.15](#)) for SAAs can help generators simplify waste collection efforts, as they allow for wastes to be collected at or near the point of generation in a facility with different time limits than those for traditional waste storage areas.

Time/Quantity Limits

The generator is allowed up to three consecutive calendar days to transfer hazardous waste from an SAA to a central accumulation area. The three-day clock starts when waste amounts exceed limits of:

- 55 gallons of non-acute hazardous waste
- 1 quart of liquid acute hazardous waste
- 1 kilogram (2.2 pounds) of solid acute hazardous waste

Locations

There is no limit to the number of SAAs allowed at a facility, and more than one container is allowed in any SAA as long as each drum contains a different waste stream and quantity limits are not exceeded. For example, you may have more than one 55-gallon drum in a single

SAA as long as each drum contains a different waste stream. You could also have 10 5-gallon containers of the same waste stream in a single SAA.

SAA containers must:

- Be located at or near any point of generation where wastes initially accumulate.
- Be “under the control of an operator” who is familiar with the process and has been trained to manage the container.
- Only be moved from the SAA to the central accumulation area. They must not be moved from one SAA to another SAA.

Counting Accumulation

Accumulated waste in an SAA must be included in monthly waste count (for generator status determination). ADEQ recommends marking the quantity of hazardous waste generated in a container/month to help track monthly generation.

Required Equipment

Generators must meet preparedness and prevention regulations ([40 CFR § 262.16\(b\)\(8\)](#)) and emergency procedures ([40 CFR § 262.16\(b\)\(9\)](#)). Every SAA must include:

- An internal communications or alarm system capable of providing immediate emergency instructions to facility personal (An air horn will meet this requirement).
- A landline phone, cell phone, or a two-way radio capable of summoning outside emergency assistance
- Portable fire extinguisher
- Spill control equipment (spill kit)
- Decontamination equipment (Examples include eyewash bottles, pH neutralizer, anti-static solutions,

- emergency eyewash/shower stations)
- Water at adequate volume and pressure (hose connected to water source and/or emergency eyewash/shower stations)

Special Conditions for P- and U-Listed Wastes

Residues remaining in containers that held commercial chemical products are hazardous wastes. The residue may be considered separately from its container for determining the weight of hazardous waste and thus which generator rules apply. Accordingly, the container itself does not need to be included when calculating the maximum accumulation volume.

More Information

Email: wastecompliance@azdeq.gov

ADEQ website: azdeq.gov

Code of Federal Regulations
(40 CFR 262.15):
ecfr.io/Title-40/Section-262.15

