

Chapter 4

Setting Up Waste Accumulation Areas

Note “☞” - Indicates that a more restrictive state rule or regulation may exist for particular federal regulation. Reference the units’ physical location (state) within the CEU Supplement for further guidance.

This chapter describes how to establish and maintain waste accumulation areas.

- HW accumulation areas are designed to temporarily store larger quantities of HW before shipping it off site.
- ☞ Satellite accumulation points (SAPs) are designed to conveniently accumulate small quantities of HW at or near the workstation where the waste is generated.

Usually, HW is initially accumulated at SAPs. Then it is moved to a HW storage area.

Note Although these two types of storage areas are designed to meet federal regulatory standards for accumulating and storing HW, they can also be established for managing the other types of waste described in Chapter 5. Consult the applicable CEU Supplement for state-specific requirements regarding HW accumulation.

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4.1 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.
- Step 2. Provide a means (such as ☞ secondary containment) to contain unplanned releases to the environment.

Note At a minimum, ☞ secondary containment should be designed to contain 110 % of the volume of the largest container or 105 of the total volume of all containers, whichever is greater. However, consult the applicable CEU Supplement for more stringent standards.

- Step 3. Plug floor drains within 50 feet.
- Step 4. Provide a means of ☞ internal communication, such as a telephone, two-way radio, or internal communications equipment.

- Step 5. Select fire extinguishers that are compatible with the types of potential fire hazards present and place them so they are visible from the front entrance.
- Step 6. Post ⚠ warning signs in visible locations at the site. The signs must be readable from 50 feet away and contain the information in Fig. 4-1.

Figure 4-1. Hazardous Waste Accumulation Sign



- Step 7. 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.

- Step 8. Segregate ⚠ incompatible wastes with berms, curbs, walls, spill pallets, or other physical devices. See Chapter 3 for incompatibility guidance.
- Step 9. After setting up the HW accumulation area, complete the ⚠ inspection log IAW the applicable CEU supplement.

Maintaining a Hazardous Waste Accumulation Area

- Step 1. Position container(s) so the waste stream name is clearly visible and there is enough room between containers (usually ⚠ three feet) to conduct inspections. Also, elevate containers by using pallets or other devices to avoid standing water.
- Step 2. Ensure that container labels are completed IAW Chapter 5 and that all universal waste and HW containers have accumulation start dates.
- Step 3. Ensure that ⚠ incompatible wastes are segregated.
- Step 4. Ensure that containers are secured against unauthorized entry.
- Step 5. Complete a ⚠ Hazardous Waste Accumulation Inventory Log IAW the applicable CEU supplement.

- Step 6. Conduct weekly inspections of the waste accumulation area in accordance with the applicable CEU supplement.

4.2 Satellite Accumulation Points

A SAP is a location at or near a process generating HW where up to 55 gallons of HW can be accumulated. Once this limit is reached, mark the date on the container and move it to the HW accumulation area within 72 hours (including weekends and holidays).

A SAP must be under the control of the operator of the process that generates the waste. "Under control" means that the person generating the waste controls what waste is put in the SAP.

Note: SAPs must be located within the physical boundaries of a given facility. Individual units which are geographically separated, such as stations comprising a group, may be considered SAPs within the group command. Consult the applicable CEU Supplement to see if SAPs may be used.

Setting Up a HW Satellite Accumulation Point

- 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.
- Step 2. Plug floor drains within 50 feet.
- Step 3. Select fire extinguishers that are compatible with the types of potential fire hazards present and place them in a prominent location near the SAP.
- Step 4. Post warning signs in visible locations at the site. The signs must be readable from 50 feet away and contain the information in Figure 4-2.

Figure 4-2. Satellite Accumulation Point Sign



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.

Step 6. Conduct inspections in accordance with the applicable CEU supplement.

Maintaining a Satellite Accumulation Point

Step 1. Position container(s) so the waste stream name is clearly visible and there is enough room between containers (usually three feet) to conduct inspections.

Step 2. Label the container(s) IAW Chapter 5.

WARNING! DO NOT use an SAP to accumulate waste from multiple operating areas, even areas within the same shop.
DO NOT mix multiple wastes in the same container.
DO NOT mark accumulation start dates on labels until the accumulation container is full of hazardous waste. SAP allows the accumulation of hazardous waste without a time limit under strict conditions. The accumulation time requirements start once the container is full unlike hazardous waste storage areas where the accumulation time starts when the first amount of hazardous waste is put in the container.

Step 3. Conduct inspections in accordance with the applicable CEU supplement.

Step 4. Transfer the container to a HW storage area within 72 hours after the container is full (including weekends and holidays).

4.3 Accumulating Other Wastes

USCG activities may also use (but are not required to use) SAPs or HW storage areas for the following types of wastes (described in Chapter 5):

- Universal wastes (e.g., fluorescent light bulbs and lithium batteries)
- Recyclable/reusable materials (e.g., lead-acid batteries and off-specification fuel)
- Non-Hazardous regulated waste (e.g., used oil and antifreeze)

At a minimum, accumulation or storage areas for these wastes should be at a location that provides compatible storage, is protected from the elements, and is provided with a means of secondary containment to prevent potential release to the environment.

CAUTION When storing liquid nonhazardous wastes, such as used antifreeze and used POLs, in shop areas, provide a means to prevent release to floor drains and the environment.

There is a ⚡ one-year accumulation time limit for universal waste. However, there are no accumulation time limits for recyclable/reusable materials, or nonhazardous wastes. These wastes may be accumulated until there is enough to be picked up by the contractor, or facility staff for transportation, call the CEU for specific guidance.

To set up an accumulation area for these items, follow the five steps below.

- 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.
- Step 2. Ensure the area provides a means to prevent release to floor drains or to the environment (e.g., ⚡ secondary containment, berms, or spill pallets).
- Step 3. Select fire extinguishers that are compatible with the types of potential fire hazards present and place them so they are visible from the front entrance.
- Step 4. Coordinate with the Unit Materials and Hazardous Waste Coordinator for the proper type and location of extinguishers.
- Step 5. Locate ⚡ spill response equipment nearby in sufficient quantity and type to contain a spill.

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