

Focus on: Satellite Accumulation Areas



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ADA Accessibility

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For Relay Service or TTY call 711 or 877-833-6341.

A satellite accumulation area (SAA) allows you to accumulate dangerous waste near the work area where it's generated. After you meet a certain threshold, you move the waste to a central accumulation area (CAA), storage area, or send to a designated facility for proper management.

The SAA rules allow you to accumulate wastes longer than 90 or 180 days without having a dangerous waste storage permit if you meet certain conditions (WAC 173-303-174).

The SAA rules only apply to medium quantity generators (MQGs) and large quantity generators (LQGs). The dangerous waste regulations do not provide requirements for small quantity generators (SQGs) to accumulate waste in satellite accumulation areas, as SQGs generally do not have any time limits for waste accumulation.

Basic standards

Satellite accumulation does not require a storage permit as long as you:

- Accumulate waste in containers at or near the point of generation.
- Have less than 55 gallons of dangerous waste or one quart (2.2 pounds) of acutely hazardous waste in your SAA at all times.
- Label and mark containers properly.
- Keep waste in good condition, non-leaking containers.
- Keep waste in containers that are compatible with the waste inside.
- Keep containers closed at all times, except when adding or removing waste or temporarily venting.
- Handle the container in a way that prevents leaks.

Container labeling and marking requirements

All SAA containers must be clearly labeled or marked with the words "**Dangerous Waste**" or "**Hazardous Waste**" and its hazards (ignitable, corrosive, reactive, and/or toxic).

Label size

Labels and markings must be legible from a distance of 25 feet or the lettering size must be a minimum of one-half inch in height. For containers less than one gallon (or four liters), the marking or lettering can be appropriate for the size of the container. [Learn more about hazard labeling.](#)¹

Accumulation start date

Once you accumulate 55 gallons of dangerous waste or one quart (2.2 pounds) of acutely hazardous waste in a container, immediately mark it with the accumulation start date. Within three calendar days you must move all waste in the SAA to a CAA or send to a permitted Treatment, Storage, and Disposal (TSD) facility.

Only containers are allowed in SAAs

You may only accumulate waste **in containers**. You cannot use tanks, waste piles, drip pads, containment buildings, or any other dangerous waste management unit or device in your SAA.

- Follow the separation distances listed in the International Fire Code for explosives storage if you have reactive wastes in your SAA.
- Follow the special requirements for incompatible wastes if you have them. Learn more about these specific requirements in WAC 173-303-174(1)(e).

Controlling your SAA to prevent improper wastes

You must prevent improper wastes, such as incompatible materials or waste streams with different waste codes, from being added to the same satellite container. A generator may accumulate up to 55 gallons of dangerous waste or one quart of acutely hazardous waste **in containers at or near any point of generation**. The SAA must be located in the same area that generates the waste.

All SAA waste containers must also be under the control of the operator **or** secure at all times. Safely secure your wastes by:

- Locking your area or using a locking device on the container.
- Creating a system to prevent the improper or unauthorized addition of waste to a satellite accumulation container. For example, training employees who have access to satellite accumulation areas about the requirements.

Venting containers

Keep containers closed at all times, except when:

- Adding or removing waste.
- Venting temporarily.

You may only vent a container if it is necessary for the proper operation of equipment or to prevent dangerous situations, such as pressure buildup.



Figure 1: A secured satellite accumulation area.

¹ <https://apps.ecology.wa.gov/publications/SummaryPages/1904023.html>



Figure 2: Label each of your waste containers properly.



Figure 3: Safely transport your waste to the satellite accumulation area.



Figure 4: Ecology inspectors will check your accumulated waste.

Number of SAAs, containers, and waste streams

You may have as many SAAs as you need on site as long as they all meet the requirements.

You may have as many containers in your SAA as you need as long as you do not exceed the total volume threshold limits.

You may accumulate many individual waste streams in their own containers as long as you do not exceed the total volume limits. For example, you may have a 35-gallon container of paint waste and a 20-gallon container of spent solvent in a single SAA.

You can only have waste from routine operations in your SAA

The term “during routine operations” under the [satellite accumulation area definition](#)² limits these management standards to wastes that are generated on a relatively continuous basis. Wastes generated on an infrequent or one-time basis (for example, spills) cannot be held in SAAs.

Central accumulation area or permitted storage facility

If dangerous waste is placed in an area that is not defined and managed as a satellite accumulation area, then the area is regulated as either a CAA or a permitted storage facility.

Make sure your SAAs are separate from central accumulation areas at your facility. They may be co-located in the same room as long as they are distinct areas (such as adjacent to one another).

Treatment is not allowed in SAAs

You cannot treat your waste in SAAs. Since treatment has inherently greater risk, all treatment by generator activities must be conducted in a CAA where there are additional requirements, such as weekly inspections and secondary containment.

Please note you are not limited to the number, location, or size of CAAs on your site, as long as you meet the applicable requirements. You may treat at or near the point of generation if you comply with all CAA rules where treatment occurs.

Additional management requirements

On a case-by-case basis, Ecology may require the satellite area to be managed under CAA standards. We may require this if the nature of the wastes being accumulated, a history of spills, releases from accumulated containers, or other factors are determined to be a threat or potential threat to human health or the environment (WAC 173-303-174(2)).

² <https://apps.leg.wa.gov/WAC/default.aspx?cite=173-303-040>