Most hazardous waste generators need to accumulate their waste for some period of time while they collect enough for an off-site shipment or on-site recycling. However, if you accumulate your wastes on-site for too long, you may need to get a Dangerous Waste Storage Permit from the Department of Ecology. That can take a few years and you will face many more requirements under the Dangerous Waste Regulations (Chapter 173-303 WAC).

Follow the checklist below to find out what Ecology means by “too long” and what you need to do to properly accumulate hazardous waste.

- Establish a hazardous waste accumulation area in a secure place within your facility.

  Accumulation areas should be well marked and restricted to as few people as possible to avoid accidental damage to containers.

  You may want to consider a special storage cabinet for your ignitable wastes. Check with your local fire department for other safety ideas.

- If your accumulation area was constructed after September 30, 1986, you must have a containment system, such as a diked, concrete area, that is capable of holding leaks and spills.

  Your containment system should be able to hold 10 percent of the total volume of all containers with liquid wastes, or the volume of the largest container, whichever is greater.

- Establish satellite accumulation areas, if necessary.

  A satellite accumulation area is a location at or near any point of generation of a hazardous waste where:
  - the waste is initially accumulated (up to 55 gallons), and
  - there is someone monitoring the area.

  For example, you accumulate spent solvent in a 55-gallon drum near the service bays of your automotive repair shop (a satellite accumulation area) and move the drum when it's full to the storage room which has a spill containment system (your accumulation area).
As soon as you generate a hazardous waste...

- Place it in an appropriate container that is clearly marked with the words “Dangerous Waste” or “Hazardous Waste”.

There are numerous safety supply companies that sell labels for this purpose. See Checklist Fact Sheet 7 for a more detailed discussion of your container management responsibilities.

- Mark each container with a label or sign that identifies the waste’s major risk(s) so it is clearly visible to employees, emergency response personnel and the public.

Some generators use the National Fire Protection Association (NFPA) labeling system for their wastes. A four-color, diamond-shaped label is filled in with the appropriate code for health, fire, instability, and special hazards.

To avoid the need for a storage permit...

- Mark the accumulation start date on each waste container.

The accumulation period begins on the date that:
- you accumulate more than 55 gallons in a satellite accumulation area, or
- you first generate the waste and put it into a container in your accumulation area.

- Do not accumulate your wastes for too long. Make sure you ship your waste to a facility or manage it on-site in a facility that has a dangerous waste permit. . .

  . . . within 180 days from the date it was first generated, if you generate less than 2,200 pounds (but more than 220 pounds) of hazardous waste per month and never accumulate more than 2,200 pounds on the premises¹.

  . . . within 90 days from the date it was first generated, if you generate more than 2,200 pounds of hazardous waste per month or accumulate more than 2,200 pounds on the premises¹.

- Comply with the requirements on the following Checklist Fact Sheets which are available from the nearest Ecology regional office:
  - Checklist Fact Sheet 4 Perform preventive maintenance.
  - Checklist Fact Sheet 6 Plan for emergencies.
  - Checklist Fact Sheet 7 Use proper containers and manage them correctly.

¹ Generators can only accumulate up to 2.2 pounds of certain pesticides and poisons. Hazardous Waste Specialists at Ecology’s regional offices can help you find the accumulation limit for your waste.