# SATELLITE ACCUMULATION AREA (SAA)

Hazardous Waste Management Plan, 40 CFR § 262.15 and 40 CFR § 273.13





# Possible areas of concern and characterization

Improper waste disposal violates the Resource Conservation Recovery Act (RCRA) and Fort Knox's permit. Materials classified as a hazardous or universal waste require special handling and collection. Both hazardous and universal wastes are collected in satellite accumulation areas, however, there are different governing regulations. Universal Waste includes: batteries, spent lamps, pesticides, Mercury-containing equipment and aerosol cans. Hazardous waste examples are: expired products, paint's, thinners, cleaners, solvents, broken lamps to name a few.

## **HANDLING PROCEDURES**

- **Step 1** Contact EMD Hazardous Waste Classification Unit (HWCU) at 502-624-3692/6598/8379 to determine the need for a SAA.
- **Step 2** SAA containers must be labeled as Hazardous Waste or Universal Waste with the label facing out and visible. SAA containers must remain closed except when adding waste to the container.
- Step 3 The SAA site must be under the direct control of a trained operator, at or near the point of generation.
- **Step 4** Each SAA site requires inspections:
  - EMD HWCU conducts the monthly inspections
  - Operators should conduct periodic visual inspections
  - All deficiencies must be corrected on the spot and reported immediately to the site supervisor and HWCU Program Manager

### **NOTES**

- Units arriving at Fort Knox for training must contact EMD HWCU for guidance on waste disposal.
- Universal waste accumulation: ≤ one year, no quantity limits.
- Hazardous waste accumulation: as much as 55 gallons of non-acute and or either/ 1 qt liquid or 1kg solid
  acute per SAA, no time limits.

#### **CONTACT INFORMATION**

Hazardous Waste Classification Unit 502-624-3692/6598/8379