



**STATE OF TENNESSEE
DEPARTMENT OF TRANSPORTATION
ENVIRONMENTAL COMPLIANCE OFFICE**

SUITE 900 - JAMES K. POLK BUILDING
505 DEADERICK STREET
NASHVILLE, TENNESSEE 37243-0334

TDOT STANDARD OPERATING PROCEDURE - ENVIRONMENTAL

NO.
012

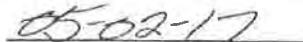
Subject: SATELLITE ACCUMULATION AREAS

Reviewed and
approved by:

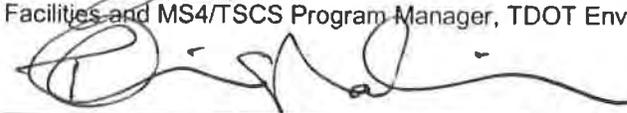


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Facilities and MS4/TSCS Program Manager, TDOT Environmental Compliance Office



Date



Toks Omishakin

Environmental Bureau Chief, TDOT Environmental Planning Bureau



Date

Status: Revised and re-approved with no significant changes.

Version 5 – Replaces
Version 4 dated May 2016

1.0 PURPOSE AND SCOPE

This Standard Operating Procedure (SOP) applies to the accumulation of hazardous wastes and special wastes in containers at or near the point of generation, and to all TDOT facilities that generate such waste.

2.0 OPERATIONAL REQUIREMENTS

1. Satellite accumulation areas (SAAs) must be set up indoors, under roof, and protected from the weather. The SAA must be located at or near the point of generation under the control of the person generating the waste.
2. SAAs shall have a sign placed on the wall, where possible, identifying the wastes being accumulated.
3. The volume of hazardous waste accumulated within an individual SAA must not exceed 55 gallons at any one time.
4. All containers in SAAs will have labels describing the waste being placed in the container. For wastes that have been determined to be hazardous wastes, the words "Hazardous Waste" should also be on the label.
5. The date waste is first placed in a container will be recorded on the container label.

6. Only U.S. Department of Transportation approved containers may be used for waste accumulation. Containers must be compatible with the wastes being accumulated.
7. All containers used for waste accumulation will be in good condition. No containers with signs of corrosion, bulging, or denting will be used. When containers used for accumulation are discovered to be damaged, the waste will be transferred within 24 hours to a container that is in good condition. Contents of leaking containers will be immediately transferred to a new container upon discovery.
8. All containers will remain closed except when adding or removing wastes. Lids will be sealed by replacement of the lid, bung, or drum ring (as appropriate to the type of container) when waste is not being added. Fill devices such as funnels or pumps shall be used as appropriate to ensure that spills of hazardous waste do not occur when containers are being filled or emptied.
9. Incompatible waste (i.e., wastes that react when mixed) will not be accumulated within the same SAA. SAAs for incompatible wastes will be separated by at least 10 feet to ensure that mixing of incompatible wastes does not occur.
10. Containers of liquid waste will be accumulated with secondary containment so that spilled or leaked material is captured. Secondary containment (e.g., spill pallets) must provide capacity for containing a minimum of 10% of the total volume of liquid hazardous waste when multiple containers are used, or the volume of the largest container placed upon the pallet, whichever is the larger volume. Constructed berms or diking may also serve as a means of secondary containment.
11. Upon reaching 55 gallons of a single hazardous waste in an SAA or upon filling a container (if less than 55 gallons), the waste will be removed to an accumulation area (AA) within 3 days. No more than 55 gallons of a single hazardous waste may be accumulated in any SAA, except during this 3-day period.
12. Emergency response equipment at each facility where SAAs are used shall include a fire extinguisher, a spill kit appropriate for the types of wastes being accumulated (e.g., oils, corrosives), and an over pack drum.
13. Each SAA will be formally inspected monthly to ensure this SOP is being followed and that containers are in good condition. If a finding is made during the inspection, the date and action taken to remedy the finding will be recorded on the inspection form where the finding was identified.
14. Completed inspection forms will be maintained in the appropriate color-coordinated notebook for three years from the date of inspection.
15. Waste accumulation inventories must be accurate and up to date.
16. ECO will be notified of uncharacterized containers of waste generated at the facility immediately.

Each SAA must be under the control of the operator of the process generating the waste. This person(s) has the responsibility for ensuring this SOP is followed.

Note: The requirements for hazardous waste satellite accumulation areas outlined above have been applied as a best management practice to all hazardous and special wastes generated from TDOT maintenance and industrial operations. This SOP does not apply to solid waste (i.e., trash) that may be disposed of in the solid waste dumpsters (e.g., office trash, packing materials), to universal wastes, to most wastewater (e.g., vehicle washing, floor mopping, and highway marking paint cleanup wastewaters), or to most recyclable materials. This SOP does apply to all launderable rags or absorbent pads.