

## **SATELLITE ACCUMULATION AREAS**

### **1.0 Objective**

The objective of this surveillance is to evaluate the effectiveness of the laboratory's management of hazardous and mixed wastes in satellite accumulation areas. The Facility Representative or Environmental, Safety, and Health Support Specialist evaluates compliance with DOE requirements as well as requirements of the Resource Conservation and Recovery Act. During this surveillance, the Facility Representative or Environmental, Safety, and Health Support Specialist conducts a walk through of a satellite accumulation area and reviews the pertinent records.

### **2.0 References**

- 2.1 40 CFR 260-270
- 2.2 DOE 5820.2A, *Radioactive Waste Management*.
- 2.3 DOE/EH - 0333, *Management of Hazardous Waste Containers and Container Storage Area, Under RCRA, August 1993*.

### **3.0 Surveillance Activities**

In performing this surveillance, the Facility Representative or Environmental, Safety, and Health Support Specialist completes the following activities

Activity 1 - Satellite Accumulation Area Walk-through.

Activity 2 - Observe Routine Use of Satellite Accumulation Area.

**Surveillance Guideline**  
**SATELLITE ACCUMULATION AREAS**

Surveillance No.: \_\_\_\_\_

Facility: \_\_\_\_\_

Date Completed: \_\_\_\_\_

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
1. Is the satellite accumulation area identified with a standard sign, such that the satellite accumulation area's name and the words "Hazardous Waste" or "Mixed Waste" are visible from more than 25 feet away?	_____	_____	_____
2. Does the satellite accumulation area sign list the names and phone numbers for the satellite accumulation area custodian and alternate?	_____	_____	_____
3. Is the satellite accumulation area marked by fencing, posts, and chain or rope, or a painted or taped border to identify the satellite area boundaries?	_____	_____	_____
4. Are effective controls established to preclude unauthorized use of a satellite accumulation area?	_____	_____	_____
5. Has a satellite accumulation area custodian been assigned for the accumulation area?	_____	_____	_____
6. Does each container have a placard indicating the volume of waste in the container?	_____	_____	_____
7. Is the total quantity of hazardous waste in the satellite accumulation area less than 55 gallons?	_____	_____	_____
8. Have any containers exceeded 55 gallons of hazardous waste, or been sealed by the satellite area custodian? If so have the containers remained in the satellite accumulation area for less than 72 hours?	_____	_____	_____

**Surveillance Guideline**  
**SATELLITE ACCUMULATION AREAS (cont.)**

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
9. Is each hazardous waste container labelled as follows:  "HAZARDOUS WASTE - State and Federal laws prohibit improper storage or disposal. If found, contact the nearest police or public safety authority."	_____	_____	_____
10. For mixed waste containers, are radioactive hazards appropriately identified?	_____	_____	_____
11. Are all labels on hazardous waste containers legible and unfaded?	_____	_____	_____
12. Are ignitable wastes in the satellite accumulation area located well away from ignition sources?	_____	_____	_____
13. Are containers for liquid, hazardous or mixed wastes away from drains unless secondary containment is provided?	_____	_____	_____
14. Are containers for liquid, hazardous or mixed wastes closed except during addition or removal of wastes?	_____	_____	_____
15. Are incompatible wastes in the satellite accumulation area stored in separate containers that are maintained so that any spills of incompatible wastes would be physically separated?	_____	_____	_____
16. Do training records substantiate that personnel entering the satellite accumulation area have received the required training on hazardous waste operations and emergency response?	_____	_____	_____
<b>Activity 2 - Observe Routine Use of the Satellite Accumulation Area</b>			
17. Do workers who deposit hazardous wastes into storage containers update the volume marked on the container?	_____	_____	_____
18. Are only authorized wastes or materials brought into the satellite accumulation area?	_____	_____	_____
19. Does the satellite accumulation area custodian or laboratory management ensure that no transfers of hazardous wastes between satellite accumulation areas are permitted?	_____	_____	_____

**Surveillance Guideline**  
**SATELLITE ACCUMULATION**

**AREAS**

YES

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20. Does the satellite accumulation area custodian or laboratory management ensure that no transfers of hazardous wastes from a staging area to a satellite accumulation area occur?

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**OTHER:**

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**NOTES/COMMENTS:**

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**Surveillance Guideline**  
**SATELLITE ACCUMULATION AREAS (cont.)**

PERSONNEL CONTACTED: \_\_\_\_\_

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**IF MORE SPACE IS NEEDED FOR FINDINGS, OBSERVATIONS, AND FOLLOWUP  
ITEMS - USE ADDITIONAL SHEETS**

FINDINGS:

Finding No.: \_\_\_\_\_

Description: \_\_\_\_\_

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Finding No.: \_\_\_\_\_

Description: \_\_\_\_\_

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**Surveillance Guideline**  
**SATELLITE ACCUMULATION AREAS (cont.)**

Finding No.: \_\_\_\_\_

Description: \_\_\_\_\_

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**OBSERVATIONS:**

Observation No.: \_\_\_\_\_

Description: \_\_\_\_\_

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Observation No.: \_\_\_\_\_

Description: \_\_\_\_\_

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**Surveillance Guideline**  
**SATELLITE ACCUMULATION AREAS (cont.)**

Observation No.: \_\_\_\_\_

Description: \_\_\_\_\_

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**FOLLOWUP ITEMS:**

Followup Item No.: \_\_\_\_\_

Description: \_\_\_\_\_

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Followup Item No.: \_\_\_\_\_

Description: \_\_\_\_\_

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**Surveillance Guideline**  
**SATELLITE ACCUMULATION AREAS (cont.)**

Followup Item No.: \_\_\_\_\_

Description: \_\_\_\_\_

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LABORATORY MANAGEMENT DEBRIEFED AND RESULTS: \_\_\_\_\_

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Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Facility Representative or  
Environmental, Safety, and Health Support Specialist