

Regulated Waste Storage

Storage of both hazardous and non-hazardous waste is subject to federal and state regulations. Additionally, improper storage of wastes has the potential to contaminate soil, surface water and groundwater. Adhering to the following guidelines will help facility operators meet waste storage requirements and reduce the risk of being held responsible for costly cleanup of contaminated soil or water resources.

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Non-Hazardous Waste Storage

General Requirements

- Waste containers must be stored away from the outside elements. Store indoors or provide other protection from sunlight, rain and snow.
- Waste containers must remain closed except when adding waste.
- All waste containers must be labeled with a clear description of the contents.
- Aisle space must be maintained between containers to allow unobstructed movement of personnel to conduct periodic inspection of the containers. For example, enough room to maneuver a two wheel dolly between the rows of containers.
- Whenever possible, provide containment capable of preventing potential releases from escaping the storage area.
- Waste stored in piles, such as flammable waste trap sediment, must be kept under a roof or covered with a tarp to prevent releases.

Hazardous Waste Storage

General Requirements

Hazardous waste must be stored safely in an appropriate storage area away from the outside elements. Whenever possible, hazardous waste should be stored indoors in a secured area. Requirements for indoor hazardous waste storage include the following:

- Hazardous waste must be stored in [approved containers](#).
- Containers holding hazardous/regulated waste must remain closed, except when adding waste.
 - *The containers “ring and bung” must be secured except if it contains partially full, unusable aerosol cans. Containers holding waste partially full aerosol cans must be equipped with a loose fitting cover or a cover with a pressure release valve.*
- All containers holding hazardous/regulated waste [must be properly marked and labeled](#) .
- Incompatible wastes must be separated by a dike, berm or wall.
 - *Example: lead-acid batteries and stoddard solvent are incompatible and so must be separated.*
- Wastes with any free liquids must be stored on an impermeable surface with no floor drains.
 - *Concrete may need to be sealed to make it impermeable*
 - *Drums may be placed in a plastic tub or other device to contain spills or releases. Containment material must be compatible with waste material stored within the containment area.*
 - *Any cracks in the floor of the hazardous waste storage area or other containment measures must be repaired.*
 - *Bituminous is not impermeable to most liquid chemicals.*
- All ignitable waste stored outdoors must be at least 50 feet inside the property line. This is not considered indoors as stated above.
- Aisle space between storage containers must be maintained in order to allow unobstructed movement of personnel to conduct inspections or to operate fire and spill

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control equipment. Generally, aisle space that can accommodate a two wheel dolly is sufficient.

- *Do not place equipment or other items on or around hazardous waste storage containers.*
- The hazardous waste storage area must be secured from unauthorized access and inadvertent damage and labeled “Hazardous Waste Storage”.
 - *Example: a locked room, a locked building or locked fence.*
- [Weekly inspections of the hazardous waste containers and integrity of the storage area must be conducted and documented.](#)
- Wastes may only be [stored in limited quantities and for a limited time.](#)
- Keep emergency and spill equipment (absorbent, Federal DOT-approved container, sparkless shovel, fire extinguisher) in or near the storage area.
- Must have a communication system in or near the storage area. Acceptable communication devices include a telephone, cell phone, two-way radio or alarm.
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Storage Area Inspection

Hazardous waste storage areas must be inspected weekly. [Inspection logs](#) must be kept on file at the facility for a minimum of three years. The following items must be inspected:

1. **Containers:** Are all containers in good condition (no dents, rust etc.)?
2. **Leaks:** Are containers leaking? Is there evidence of a release?
3. **Labels:** Is a “Hazardous Waste” label or other appropriate marking visible on each container?
4. **Clear Description:** Is a clear description of the container contents marked on each container?
5. **Fill Date:** Is the fill date listed on the hazardous waste label?
6. **Access:** Is anything blocking access to each container? Is proper aisle space maintained?
7. **Incompatible Wastes:** Are all incompatible wastes separated by a dike, berm or wall?
8. **[Storage Limits:](#)** Are the containers stored longer than the regulations allow?
9. **[Quantity:](#)** Does waste volume exceed storage limits?
10. **Spill Control Equipment:** Does the spill control equipment include a DOT-approved container, sparkless shovel and absorbent?
11. **Communication Device:** Is there a communication device in or near the storage area?

Inspection Log Directions

The following list of items must be inspected in the Hazardous Waste Storage area on a weekly basis. Any problems discovered during the inspection must be immediately corrected and brought to the attention of the District Safety Administrator. The items are as follows:

1. Containers in good condition.
2. No leaking containers or spills.
3. "Hazardous Waste" label or other appropriate marking visible on each container.
4. Clear description of the waste/material on each container.
5. Fill date on the hazardous waste label.
6. Nothing is blocking access to each container (proper aisle space maintained).
7. All incompatible wastes are physically separated.
8. Containers are not stored longer than the required storage limit.
9. Quantity of waste does not exceed storage limit.
10. Adequate spill control equipment: sparkless shovel, absorbent, DOT-approved container.
11. Communication device in or near storage area.

Storage Limits

The amount of waste and the length of time it can be stored on-site vary depending on the facility generator size or if the waste is collected in a satellite container.

- ***Minimal Generator***
Accumulation Limit: Less than 10 gallons or 100 pounds annually.
Storage Time Limit: When the accumulation limit is reached, [transport](#) for disposal/recycling within 75 days.
- ***Very Small Quantity Generator***
Accumulation Limit: Less than 220 gallons or 2,200 pounds annually (four 55-gallon drums).
Storage Time Limit: May store less than 220 gallons or 2,200 pounds indefinitely. When the accumulation limit is reached, [transport](#) for disposal/recycling within 180 days.
- ***Small Quantity Generator***
Accumulation Limit: Less than 660 gallons or 6,600 lbs. annually (about twelve 55-gallon drums).
Storage Time Limit: When the accumulation limit is reached, [transport](#) for disposal/recycling within 180 days.
- ***Satellite Accumulation***
Accumulation Limit: Maximum of one 55-gallon container at or near point of waste generation for each type of hazardous waste.
Storage Time Limit: Must move the drum to permanent hazardous waste storage area within three days after the drum is filled.

Satellite Accumulation of Hazardous Waste

Satellite accumulation of hazardous waste can be used in circumstances where small quantities of waste are frequently produced, such as in a laboratory generating waste from material testing. Under the satellite accumulation rules, generators of hazardous waste do not have to comply with normal storage time limits until the container is full.

Location of a satellite accumulation container must meet all the following requirements:

1. The container is stored at or near the point of waste generation.
2. The container is under the control of the employee generating the waste, at or near the point of generation.
3. No more than 55 gallons of each hazardous waste can be stored at a satellite accumulation location.
4. Container must be moved to the hazardous waste storage area within three days after becoming full.

Containers used for satellite accumulation of hazardous waste must meet all the following requirements:

1. Container capacity cannot exceed 55 gallons.
2. Meet all requirements for [determining the proper storage container](#).
3. The container must be labeled “Hazardous Waste”.
4. Write a clear description of the waste on the hazardous waste label or container.

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5. Meet all [Hazardous Waste Storage General Requirements](#). Satellite-accumulation containers that are under direct control of an operator and are visually inspected daily by that operator do not need documented weekly inspections during waste accumulation.
6. Date the container when it becomes full and move to the hazardous waste storage area within three days.