

Satellite Accumulation SOP Hazardous Waste Management Rules

All satellite wastes (RCRA and Non-RCRA regulated) on campus shall comply with 40 CFR 262.15. In summary, waste containers *must* be:

1. In good condition
2. Compatible with contents therein
3. Located “at or near the point of generation”
4. In the operator’s “direct control”
5. Closed at all times except when:
 - a. Adding, removing, or consolidating waste;
 - b. Temporary venting is necessary; or
 - c. Proper equipment operation requires an open container
6. Clearly labeled with the following:
 - a. Contents
 - b. Hazards of the contents using specific verbiage or labels from GHS, NFPA, or DOT
 - c. The words “Hazardous Waste” or “Non-RCRA Waste”
7. Separated by a physical barrier from other containers that are incompatible
8. Have an EHS Satellite Accumulation Sign (found at the end of this document) either attached directly to the container or within a readable distance from the container

Once the container is full, *immediately* write the date on the container or its label and submit a service request for pickup to EHS by going to nau.edu/ehs. In the description box include the size of the container(s), contents, location, best time for pickup, and if a replacement container or containers are needed.

In addition, all satellite accumulation areas must meet the Preparedness, Prevention, and Emergency Procedures outlined in the EHS Contingency Plan and comply with all other applicable regulations including but not limited to OSHA, NFPA, and IBC regulations.

NAU SATELLITE ACCUMULATION OF HAZARDOUS WASTE

NAUWHEN CONTAINER IS FULL, WRITE THE DATE AND CONTACT EH&S FOR REMOVAL BY SUBMITTING A SERVICE REQUEST ON THE NAU EH&S WEBSITE: NAU.EDU/EHS

Instructions for managing waste at the satellite site:

Hazardous Waste Label Instructions

- NO** dates on labels or containers until **full**.
- Description of waste **MUST** be visible.
- Container **MUST** be marked to identify the hazards of the waste (DOT, GHS, NFPA, clear wording are all acceptable).
- Container **MUST** be labeled with the words "hazardous waste".

Container Management Instructions

- Container must be **CLOSED** at all times except when adding waste to the container, temporarily venting, or if an open container is required for machinery/instrument operation.
- Container must remain at or near the point of waste generation until full.
- A physical barrier **MUST** separate waste containers that are incompatible (dish pan, berm, wall, etc.).
- Satellite containers are subject to preparedness, prevention, and emergency procedure requirements. Please see EHS Contingency Plan on the EH&S website for more information.
 - Emergency coordinators: Mick Kelly: (928) 308-6507 Joshua Ellsworth: (928) 853-3958

Time and Volume Limits for Waste Accumulation

- Satellite accumulation containers must be ≤ 55 gallons of hazardous waste or ≤ 1 quart/1 kg of acutely hazardous waste.
- When full, **IMMEDIATELY WRITE THE DATE DIRECTLY ON THE CONTAINER OR ON THE LABEL** and **CONTACT EH&S FOR CONTAINER REMOVAL BY SUBMITTING A SERVICE REQUEST @ NAU.EDU/EHS**
- Full containers of hazardous waste must be moved within three (3) days to EH&S' central accumulation area.

NAU POLICE DISPATCH: 911 (emergency), 928-523-3611 (non-emergency)

NAU Safe Application:

