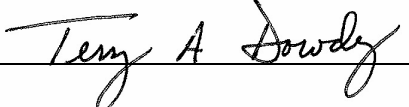


Texas State University - San Marcos Environmental Health, Safety & Risk Management	No.	RMS-01.01	Rev.	C
	Title	Satellite Accumulation Area Compliance Inspection		
	Date	September 24, 2007	Page	1 of 3
Reviewed By	Lisa Arceneaux		Approved By	

1. PURPOSE

The purpose of the Satellite Accumulation Area (SAA) Monthly Compliance Inspection Procedure is to establish guidelines for performing monthly compliance inspections of the SAA's located in various locales on the Texas State University – San Marcos Campus. This procedure provides uniform guidelines to follow to ensure continuity and validity. These inspections are performed by EHS Office staff.

2. SCOPE

This procedure applies to all monthly SAA compliance inspections. It was created to give those persons conducting the inspection a uniform set of criteria to use in evaluating RCRA issues in the SAA's.

It is the responsibility of each SAA Contact to follow up on identified compliance hazards and correct them, or notify the proper authorities to get them corrected as soon as possible.

3. PRECAUTIONS & LIMITATIONS

- 3.1 The purpose of this inspection is to identify potential RCRA compliance issues at the SAA's. It is not meant to be a substitute for safe work practices, proper training, or protective equipment. It is not a complete or detailed audit.
- 3.2 The inspection evaluation is subject to the interpretation of the inspector. These procedures are meant to reduce the bias in the evaluations, but cannot completely eliminate it.

4. TERMS

- EHS – Environmental Health and Safety
- Monthly inspection - Inspection conducted for each SAA on a monthly basis and documented using the monthly SAA inspection form for each SAA.
- RCRA - Resource Conservation Recovery Act
- SAA - Satellite Accumulation Area for hazardous and Class 1 Industrial Waste.
- SAA Contact - the person designated responsible for that particular SAA.
- Secondary Containment - Open container used to store waste containers of sufficient capacity to hold entire contents of waste container. Can also be a flammable or acid storage cabinet.
- Waste Containers - Normally 5 gallon polypropylene carboy with screw top, can also be original containers with screw top.

Texas State University - San Marcos Environmental Health, Safety & Risk Management	No.	RMS-01.01	Rev.	C
	Title	Satellite Accumulation Area Compliance Inspection		
	Date	September 24, 2007	Page 2 of 3	

5. PROCEDURE

5.1 Each inspection item will be evaluated against standard criteria outlined in this procedure. For yes/no questions, the answer “yes” will meet the criteria in the items a - j below. If the criteria require specific information, it is indicated below.

- a. Waste Containers properly labeled
 - EHS Hazardous waste tag attached to container.
 - Hazardous waste tag identifies waste category in container (chemical, biological, radioactive).
 - Individual waste types identified (i.e. H₂SO₄, NaOH, ethylene glycol, etc.)
- b. Waste containers closed
 - Container closed unless waste is being added.
 - Open top funnel NOT left in container opening.
 - In process lines to open containers need to be covered.
- c. Waste containers in good condition
 - Waste container NOT bulging.
 - Waste container NOT collapsing.
 - No crystal formations or other signs of leakage on outside of container.
- d. Waste containers compatible with contents
 - Waste container NOT bulging.
 - Waste container NOT collapsing.
 - Incompatible waste containers separated from each other
- e. Incompatible containers not in same secondary containment
 - Oxidizers and reducers separated.
 - Acids and bases separated.
 - Flammable waste separated from other waste types or stored in fire proof cabinets.
- f. Waste containers are provided with secondary containment
 - Waste containers inside secondary containment.
 - Secondary containment of adequate capacity to hold contents of waste container.
- g. Emergency contact information posted nearby
 - 911 listed as emergency contact number.
- h. Suitable spill control materials
 - Spill control materials located near SAA.
 - Spill control materials clearly identifiable.

Texas State University - San Marcos Environmental Health, Safety & Risk Management	No.	RMS-01.01	Rev.	C
	Title	Satellite Accumulation Area Compliance Inspection		
	Date	September 24, 2007	Page 3 of 3	

- i. SAA sign
 - Sign posted in immediate area.
- j. Housekeeping
 - Area not cluttered.
 - No other materials stored in immediate vicinity.
 - No trash stored with waste chemicals.

6. PERFORMANCE METRICS

Performance metrics will be measured by calculating:

- The percentage of SAA's inspected each month.
- The percentage of inspection items that met the criteria.

7. ATTACHMENTS/APPENDICES

7.1 Attachment A, Satellite Accumulation Area Checklist

Insp #: _____



Satellite Accumulation Area Checklist

Location: _____ - _____

Date: _____ **Inspector(s):** _____

Use this checklist to perform monthly inspections of satellite accumulation areas. More frequent inspections can be performed if deemed necessary by RMSO. Keep a copy on file at RMSO and send a copy to the department SAA contact. If you notice deficiencies, describe them in the "Notes" section as well as follow-up actions you took to correct them.

	Yes	No	N/A
1. Waste containers properly labeled?			
2. Are waste containers closed?			
3. Are waste containers in good condition?			
4. Are waste containers compatible with contents?			
5. Are incompatible waste types well separated from each other?			
6. Are waste containers provided with secondary containment?			
7. Is emergency contact information posted nearby?			
8. Are suitable spill control materials nearby and in a well marked location?			
9. SAA sign posted?			
10. Good housekeeping?			

Notes:

Please put the building codes and room numbers in the line for "Location" followed by the name of the building.

The following codes are to be used: Aquatic Biology (768), Biology/Supple (818), Chemistry (783), EARDC (768), Physical Plant Shops (778), Joanne Cole Mitte/Art (846), Roy F. Mitte (845), Sabinal/Photography (737), Print Shop (102), Custodial (101), Family & Consumer Science (756), LBJ Student Center (840).