

RCRA Inspection Report

1) Inspector and Author of Report

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2) Facility Information

University of Florida
3076 Longleaf Road
Gainesville, Florida 32611
EPA ID: FLD000823393

3) Responsible Official

Matthew Doty
Hazardous Material Program Manager
Division of Environmental Health and Safety
University of Florida
Surge Area Drive, Building 831
PO Box 112725
Gainesville, Florida 32611

4) Inspection Participants

Matthew Doty	University of Florida
Tori Goodwin	FDEP Northeast District
Daryl R. Himes	US EPA Region 4

5) Date and Time of Inspection

December 16, 2021 at 9:00.m.

6) Applicable Regulations

Subtitle C of the Resource Conservation and Recovery Act (RCRA) (42 U.S.C. §§ 6921 – 6939g), the Chapter 403 of the Florida Statutes (Fla. Stat.), Fla. Stat. §§ 403.702 et seq.; 40 Code of Federal Regulation (C.F.R.), Parts 260 - 270, 273 & 279, and Rule 62-730 et seq. of the Fla. Admin. Code Ann.

Chapter 403 of the Florida Statutes, Fla. Stat. § 403.702 et seq., and rules 62.710.210 -.901, and 62-730 et seq. of the Florida Administrative Code Annotated (Fla. Admin. Code Ann.).

As the State's authorized hazardous waste program operates in lieu of the federal RCRA program, the citations of those authorized provisions alleged herein will be to the authorized State program; however, for ease of reference, the federal citations will follow in brackets.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17], a LQG may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Section 403.722 of the Florida Statutes, Fla. Stat. § 403.722 [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17] (hereinafter referred to as the "LQG Permit Exemption").

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of non-acute hazardous waste in containers at or near the point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or without having interim status, as required by Section 403.722 of the Florida Statutes, Fla. Stat. § 403.722 [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.16(b) or §262.17(a)], except as required in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the "SAA Permit Exemption").

Pursuant to Fla. Admin. Code Ann. r. 62-730.185(1) [40 C.F.R. § 273.9], a "Small Quantity Handler of Universal Waste" (SQHUW) is a Universal Waste handler who does not accumulate 5,000 kilograms or more of Universal Waste (batteries, pesticides, mercury-containing equipment, or lamps, calculated collectively) at any time.

NOTE: As of June 18, 2018, the State of Florida has adopted the recently updated Federal hazardous waste rules, more commonly known as the Generator Improvement Rule.

Final Operating and Corrective Action Permit 17756-006-HO, effective March 27, 2019.

7) Purpose of Inspection

The purpose of the inspection was to conduct an RCRA compliance evaluation inspection (CEI) to determine the compliance of University of Florida, EPA ID# FLD000823393 with the applicable regulations.

8) Previous Inspection History

On March 25 & 26, 2021, EPA and FDEP conducted a RCRA CEI at the facility and RCRA deficiencies were discovered.

9) Facility Description

The University of Florida (“UF” or “University”) is a state-supported, public, land-grant research university located in Gainesville, Florida. The property is owned by the State University system and consists of approximately 1,900 acres (main campus). The UF operates approximately 2,700 teaching and research laboratories distributed through approximately 132 buildings and 20 colleges. The University covers all areas of engineering, biomedical, genetic, nuclear, medical, and agricultural and natural science research studies. Each laboratory is a potential satellite accumulation area for hazardous waste generated within the laboratory. The UF operations also include several support services such as maintenance, grounds, motor pool and an athletic department. The UF also provides all areas of liberal and performing arts studies. The UF was founded in 1858 and has been operating at its present location since September 26, 1906. UF now serves over 46,000 students.

The UF’s most recent Hazardous Waste Generator Notification (EPA Form 8700-12) dated August 30, 2018, characterized the facility as a large quantity generator (LQG) of hazardous waste, mixed waste (hazardous and radioactive) generator, a transporter of hazardous waste, and, on March 27, 2019, was issued FDEP Permit Number 17756-HO-006 for container storage of hazardous waste and site-wide HSWA Corrective Action. The expiration date of this permit is March 26, 2024.

Currently UF can generate hazardous waste streams, used oil and universal wastes (such as spent batteries, certain types of lamps and mercury containing devices or equipment), waste solvent, spent aerosol cans, paint waste and other wastes which include EPA Waste Codes D001, D002, D003, D004, D005, D006, D007, D008, D009, D010, D011, D012, D015, D016, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D031, D033, D034, D035, D036, D037, D038, D039, D040, F002, F003, F005, F027, P001, P003, P008, P010, P012, P014, P018, P022, P024, P028, P029, P030, P041, P042, P048, P050, P051, P059, P070, P071, P075, P077, P078, P081, P082, P087, P092, P098, P102, P105, P106, P110, P116, P119, P120, P123, P127, P198, P199, P202, P203, U001, U002, U006, U007, U008, U010, U012, U019, U029, U035, U041, U044, U046, U050, U053, U058, U067, U070, U075, U077, U080, U081, U082, U084, U085, U091, U103, U105, U106, U108, U112, U114, U115, U119, U122, U123, U125, U128, U130, U133, U134, U136, U138, U144, U147, U150, U154, U159, U161, U162, U165, U168, U169, U170, U190, U196, U200, U201, U204, U209, U210, U213, U218, U219, U220, U225, U236, U238, U239, U240, U246, U271, U279, U353, U367, U404 and U411.

10) Opening Conference

☒ Credentials Presented

☐ CBI warning to facility provided as necessary

☐ SBREFA fact sheet, if applicable

☒ Health and Safety, Personal Protective Equipment discussion

☐ Additional equipment that will be used, if applicable (FLIR camera, PID, FID)

On December 16 & 17, 2021, EPA inspector, Daryl Himes, accompanied by FDEP inspector Tori Goodwin, arrived at UF to inspect the facility to determine its compliance status with both RCRA and the State of Florida hazardous waste regulations. UF was represented by Mr. Matt Doty. Upon entering the facility, the inspectors introduced themselves, showed their credentials and explained the purpose of the visit and description of the facility’s process was discussed.

11) Findings

A brief explanation for the inspection was given, as well as an introduction of the FDEP and EPA inspectors. The inspectors requested a copy of the facility's generation points as listed in the Quick Reference Guide (QRG) of the facility's contingency plan. Numerous areas were selected from the QRG for inspection on the first day of the inspection. The inspectors performed a walk-through inspection these specific areas. The second day was spent inspecting the permitted storage and 90-day accumulation area. For all containers observed within satellite accumulation areas on the first day, unless noted otherwise, each of the containers of hazardous waste were observed to be labeled with the words "Hazardous Waste" and a description of the hazards associated with the contents of the container. In addition, unless noted otherwise, each of the containers was observed to be closed. Any containers or tanks managing used oil were labeled with the words "Used Oil" unless noted otherwise. Below is a description of the observations made during the inspection.

Building 885 Animal Sciences Building

The building hosts the academic and business offices for the department as well as the majority of animal science lecture courses. The building also includes the UF Meats Processing Center and retail store, a student library, several research laboratories, a test kitchen, and graduate student and faculty offices. The labs below are those where hazardous wastes were observed.

Room 236 Ruminant Lab

One 5-gallon, three 1-gallon and three < 1-gallon containers of hazardous lab wastes were observed in this lab.

Room 201 Nutrition Lab

One 5-gallon, one 2.5-gallon, three 1-gallon and three < 1-gallon containers of hazardous lab wastes were observed in this lab.

Room 211 Muscle-Biology Lab

One 5-gallon, two 2.5-gallon, three 1-gallon and two < 1-gallon containers of hazardous lab wastes were observed in this lab.

Room 142 Physiology Research Lab

One 5-gallon, one 2.5-gallon and five < 1-gallon containers of hazardous lab wastes were observed in this lab.

Building 1376 Cancer-Genetics Complex

The building hosts cancer and genetic studies for the university's college of medicine.

Room 435 Plant Secondary Metabolism Research

One 5-gallon, seven 1-gallon, and ten < 1-gallon containers of hazardous lab wastes were observed in this lab. One of the 1-gallon containers was not labeled with an indication of the hazard associated with the waste.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of non-acute hazardous waste in containers at or near the point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or without having interim status, as required by Section 403.722 of the Florida Statutes, Fla. Stat. § 403.722 [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.16(b) or §262.17(a)], except as required in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the “SAA Permit Exemption”).

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(5)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers (ii) with an indication of the hazards of the contents.

Room 430 Plant Secondary Metabolism Research

Nine < 1-gallon containers of hazardous lab wastes were observed in this lab.

Room 425B Development Research

One 5-gallon, nineteen 1-gallon, and seven < 1-gallon containers of hazardous lab wastes were observed in this lab. Ten of the containers were not labeled with an indication of the hazard associated with the waste.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(5)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers (ii) with an indication of the hazards of the contents.

Room 425D Genitalia Studies

Three 2.5-gallon, seven 1-gallon and twenty-three < 1-gallon containers of hazardous lab wastes were observed in this lab.

Room 420B Genitalia/Histology Studies

One 2.5-gallon, nineteen 1-gallon and thirteen < 1-gallon containers of hazardous lab wastes were observed in this lab.

Building 631 Wallace Building

Analytical Science, livestock testing, water quality testing and soil nutrient testing is performed in this building.

Room 19 Analytical Testing for Total Kjeldahl Nitrogen

Three 5-gallon containers of hazardous lab wastes were observed in this lab. The containers were receiving hazardous waste from ICP spectrometers.

Room 21 Livestock Waste Prep Area Lab

One 5-gallon, one 2.5-gallon and one 1-gallon containers of hazardous lab wastes were observed in this lab.

Room 25 pH Testing, Conductivity and Buffer Testing Lab

Three 5-gallon containers of hazardous lab wastes were observed in this lab.

Room 11 Ammonia and Phosphorous Testing Lab

Four 2.5-gallon containers of hazardous lab wastes were observed in this lab.

Room 9 Inductively Couple Plasma Testing Lab

Two 2.5-gallon containers of hazardous lab wastes were observed in this lab.

Room 7 Discrete Analyzer Testing Lab

One 5-gallon and one 2.5-gallon containers of hazardous lab wastes were observed in this lab.

Building 168 Mycology Lab

The building is used for the study of various fungi.

One < 1-gallon container of hazardous lab waste was observed in this lab.

Building 885 Plant Cell Biology

Room 1 Corn Studies

No hazardous wastes were observed in this lab.

Room 2 Tomato Flavor Studies

Eight < 1-gallon containers of hazardous lab wastes were observed in this lab.

Room 1/2 Area Between Labs 1 and 2

Two 5-gallon containers of hazardous lab wastes were observed in this area. One of the containers was not labeled with an indication of the hazard associated with the waste.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(5)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers (ii) with an indication of the hazards of the contents.

Building 341 McGuire Village Maintenance Area

This area contained buildings located centrally within the McGuire Village Housing Center which are used activities essential for upkeep of the McGuire Village Buildings.

A wooden shed was observed to contain one empty 35-gallon container for solvent rags.

A separate concrete building contained a metal cabinet with usable aerosol paint containers.

A metal shed contained thirteen 4-foot boxes of universal waste fluorescent tubes and three small boxes of miscellaneous fluorescent tubes. Each of the boxes was labeled with applicable universal waste language, were closed and marked with accumulation start dates of less than one year.

Building 1167 Rec Sports Maintenance Area

This area contained maintenance equipment for the Universities Recreational Sports Complex.

A maintenance building in this area contained one 5-gallon container of universal waste aerosol cans and one 5-gallon container of universal waste batteries. Each of the containers were labeled with applicable universal waste language, were closed, and marked with accumulation start dates of less than one year.

ND150, a solvent used to clean various grounds maintenance equipment was found not to contain any chlorinated solvents.

Five containers of used oil were observed in this area. Three of the containers were not labeled with the words "Used Oil" at the time of the inspection.

Pursuant to Fla. Admin. Code Ann. r. 62-710.210(2) [40 C.F.R. § 279.22(c)(1)], containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil."

Building 120 Aquatic Food Production Plant

The building hosts the academic and business offices and labs for aquatic food studies.

Room 210 Food Safety Lab

No hazardous wastes were observed in this lab.

Three universal waste mercury bulbs were observed in this area wrapped in bubble wrap without any label or date markings.

Pursuant Fla. Admin. Code Ann. r. 62-730.185(1) [40 C.F.R. § 273.13(d)(1)], a SQHUW must manage universal waste lamps in a way that prevents releases of any universal waste or component of a universal waste to the environment.

Pursuant to Fla. Admin. Code Ann. r. 62-730.185(1) [40 C.F.R. § 273.14(e)], a SQHUW must label or mark each lamp or container of lamps clearly with one of the following phrases: “Universal Waste-Lamp(s),” or “Waste Lamp(s),” or “Used Lamps.”

Pursuant to Fla. Admin. Code Ann. r. 62-730.185(1) [40 C.F.R. § 273.15(a) and (c)], a SQHUW may accumulate universal waste no longer than one year and must to be able to demonstrate the length of time that the universal waste has accumulated from the date that it became a waste or was received.

Room 208

No hazardous wastes were observed in this room.

Room 207

No hazardous wastes were observed in this autoclave room.

Room 212 Beer Chemistry Lab

Two 1-gallons container of hazardous waste was observed in this lab.

Building 687 Constance Theatre

The building hosts the university’s theatre operations.

No hazardous wastes were observed in the set construction shop. All paints observed in the set construction shop were water-based latex paints. No other wastes were observed in this area.

Building 52 Riker Hall Maintenance Area

This area was located in the basement area of the Riker dormitory and was used for the maintenance of the dormitory.

Two 4-foot boxes of universal waste fluorescent tubes were observed in this area in open and unmarked boxes.

Pursuant Fla. Admin. Code Ann. r. 62-730.185(1) [40 C.F.R. § 273.13(d)], a SQHUW must manage universal waste lamps in a way that prevents releases of any universal waste or component of a universal waste to the environment.

Pursuant to Fla. Admin. Code Ann. r. 62-730.185(1) [40 C.F.R. § 273.14(e)], a SQHUW must label or mark each lamp or container of lamps clearly with one of the following phrases: “Universal Waste-Lamp(s),” or “Waste Lamp(s),” or “Used Lamps.”

Pursuant to Fla. Admin. Code Ann. r. 62-730.185(1) [40 C.F.R. § 273.15(a) and (c)], a SQHUW may accumulate universal waste no longer than one year and must to be able to demonstrate the length of time that the universal waste has accumulated from the date that it became a waste or was received.

No hazardous wastes or used oil were observed in this area.

Building 135 Murphree Hall Maintenance Area

This area was located in the basement area of the Murphree dormitory and was used for the maintenance of the dormitory.

Two 4-foot boxes and five boxes of miscellaneous fluorescent universal waste bulbs were observed in this area in closed boxes labeled with appropriate universal waste language and accumulation start dates.

Two 2-foot fluorescent universal waste bulbs were observed in a open unmarked box.

Pursuant Fla. Admin. Code Ann. r. 62-730.185(1) [40 C.F.R. § 273.13(d)], a SQHUW must manage universal waste lamps in a way that prevents releases of any universal waste or component of a universal waste to the environment.

Pursuant to Fla. Admin. Code Ann. r. 62-730.185(1) [40 C.F.R. § 273.14(e)], a SQHUW must label or mark each lamp or container of lamps clearly with one of the following phrases: “Universal Waste-Lamp(s),” or “Waste Lamp(s),” or “Used Lamps.”

Pursuant to Fla. Admin. Code Ann. r. 62-730.185(1) [40 C.F.R. § 273.15(a) and (c)], a SQHUW may accumulate universal waste no longer than one year and must to be able to demonstrate the length of time that the universal waste has accumulated from the date that it became a waste or was received.

One box of universal waste batteries was observed in an unlabeled and undated box in this area.

Pursuant to Fla. Admin. Code Ann. r. 62-730.185(1) [40 C.F.R. § 273.15(a) and (c)], a SQHUW may accumulate universal waste no longer than one year and must to be able to demonstrate the length of time that the universal waste has accumulated from the date that it became a waste or was received.

Pursuant to Fla. Admin. Code Ann. r. 62-730.185(1) [40 C.F.R. § 273.34(a)], a LQHUW must label or mark each universal waste battery or container or tank in which the batteries are contained clearly with one of the following phrases: “Universal Waste - Battery(ies),” or “Waste Battery(ies),” or “Used Battery(ies).”

No hazardous wastes or used oil were observed in this area.

Building 1070 – Water Treatment Facility Maintenance

Two 35-gallon containers of used oil from gear box maintenance were observed to be labeled with the words “Used Oil” in this area.

Day 2 Friday December 17, 2021, Observations

Building 831 – Permitted Container Storage

The permitted hazardous waste storage area is in Building 831. The hazardous waste codes for the waste stored in the permitted storage facility include D001 through D043, F001 through F005, F019, F027, and numerous U and P listed hazardous wastes. The permitted storage area is divided into Phase I and Phase II. The permit limits the volume of waste that can be stored in each phase. The permit also limits the container size for storage of hazardous waste to 1, 2, 5, 12, 30, and 55-gallon containers. This concrete building is equipped with a fire suppression system, fire extinguishers, and shower stations.

Eight full-time employees work in this building handling hazardous waste. The hazardous waste personnel pick up the containers from the campus laboratories and transport them in box trucks to Building 831. Bulking and lab packing are conducted in both the Chemical Hazardous Waste and Radiological storage areas.

Phase I Area

The Phase I Area is used for the management of non-radioactive chemical wastes and universal waste lamps. The Phase I Area, which is the northern half of the building, is separated into five container storage areas. Each of the five container storage areas is constructed with a six-inch reinforced concrete slab and is separated by a secondary containment berm. The long-term hazardous waste storage areas are in Area 2B and Area 5. These areas are permitted to store waste for one year.

Hazardous waste is also stored for less than 90-days within the Phase I Area. The inspectors observed closed, labeled, and dated containers staged on secondary containment pallets in this area. All drums were closed, labeled, and dated.

Area 2B Storage

Area 2B storage is the permitted storage area for non-reactive hazardous waste to be stored up to a year. The Area 2B storage is separated by a yellow berm from the Chemical Waste Staging and Storage Area. The inspectors observed all containers on secondary container pallets, closed, labeled,

and dated. Outside the Area 2B storage, operators store super-sacks containing hazardous waste debris. At the time of the inspection, twelve 55-gallon, three 30-gallon, five 12-gallon, six 5-gallon and one small box of hazardous waste in this area. Each of the containers were closed, dated, and labeled. All the containers were dated within one year of storage time.

Area 5 Storage

The Area 5 storage is the permitted storage area for reactive (flammable) hazardous waste to be stored for up to a year. The reactive (flammable) hazardous wastes are stored in a walled room at the back of the Phase I Area. The inspectors observed thirty-four 5-gallon and four 12-gallon containers of hazardous waste to be closed, labeled, and dated in this area. All the containers were dated within one year of storage time.

Chem Swap Cabinets

The UF's "Chem Swap" cabinets are also located in the Phase I Area. When the EH&S personnel pick up a new, sealed chemical container as part of a regular waste pickup, EH&S evaluates the material for consideration in the Chem Swap program. Unopened containers of chemicals with no expiration date are kept in the cabinets for potential "resale." EH&S keeps a list of available materials on-line, and laboratories can order the materials from EH&S free of charge. This program began as part of the campus-wide "zero waste initiative."

Phase II Area

The Phase II Area is used for the management of radioactive and radioactive mixed wastes. The Phase II Area is separated into four container storage areas (6-radioactive, 7-poisons, 8-corrosive, and 9-flammable). Each of the four container storage areas is separated by a secondary containment structure. The entire container storage area is separated from the loading/unloading areas by a secondary containment structure.

The incoming wastes are tested for pH, oxidizer, and radiation levels. If possible, the wastes are neutralized before processing and storage. Radioactive wastes are segregated by individual radioisotope for storage and disposal at a permitted treatment, storage, and disposal facility. Radioactive mixed wastes are classified as poisons, flammables, or corrosives, and processed accordingly. The mixed wastes are either bulked or lab-packed in 30 or 55-gallon containers, which are placed directly into storage. Mixed wastes may be sent for incineration, energy recovery, or disposal.

The Radioactive Sources Area, listed as Radioactive Waste Bay Area 6 on the facility plan, contained only radioactive waste. The drums are stored together, and UF keeps the radioactive waste to decay for 20 half-lives before shipping out. Along the back wall of this area, were drums of radioactive liquid being consolidated. All containers were observed closed, labeled, and dated.

At the time of the inspection, the Waste Bay Area 9 was storing two 55-gallon drums of D001 hazardous waste. The drums were closed, labeled, and dated. The Waste Bay Area 7 is where UF keeps the poison waste; corrosives are stored in Waste Bay Area 8. No hazardous wastes were observed in these areas at the time of the inspection.

Freezer

The Phase II Area has a freezer storing animal carcasses that have been used in laboratory experiments and exposed to radiation. UF stores the carcasses for 20 half-lives before shipping out for disposal. No mixed or hazardous wastes are stored in this area.

The Compound

The Compound was the original UF permitted storage area. Currently, the area is being used to store spent lead-acid batteries, universal waste batteries, a less than 90-day hazardous waste storage area, (HWSA) and used oil storage. The HWSA is used to store inorganic and organic hazardous acid waste to be neutralized.

A clamshell underneath a canopy contained spent lead-acid batteries (SLABs) to be recycled. The label on the clamshell was dated June 1, 2021.

Used oil was observed in one 500-gallon double-walled used tank and five 55-gallon, two 30-gallon, five 12-gallon and five 5-gallon containers in this area. The tank and containers were each labeled with the words "Used Oil."

The incoming acid and base wastes generated by the facility are collected and neutralized with water and soda ash by the EH&S personnel. The neutralized acids and bases are discharged to the sewer to be treated at the onsite wastewater treatment plant.

Fencing/Security

The fences around the building were clean and in good condition and signs were located every 100 feet.

Recordkeeping

Per the EPA's COVID-19 field operations guidance, required and relevant paperwork were reviewed in a socially distant conference room at the time of the inspection.

The inspectors requested Building 831's contingency plan. The plan included a current emergency contact list, a fire extinguisher map, an evacuation map, and a list of emergency response equipment.

The weekly and daily inspection records for Building 831's less than 90-day hazardous waste storage area (HWSA) included:

Phase I

- General Chemical Waste Storage Area 1
- Mixed and Chemical Waste Storage Area 2A and 2B
- Ignitable Waste Storage Area 3
- Corrosive Waste Storage Area 4
- Reactive Waste Storage Area 5
- Waste Management Compound

Phase II

- Storage Area 6
- Radioactive Mixed Waste Storage Area 7
- Corrosive Mixed Waste Storage Area 8
- Ignitable Mixed Waste Storage Area 9

The inspectors reviewed the inspection records and observed the current daily and weekly inspections for April 2021 through the time of this inspection. No issues were observed during the review.

Hazardous and non-hazardous manifests were reviewed since the previous EPA inspection on March 25 and 26, 2021. No issues were noted.

A review of the facility's training records included a check of Derrick LaMontagne (Hazardous Materials Technician) records. His most recent training was performed on March 31, 2021. No issues were noted.

12) Closing Conference

The RCRA inspectors completed their inspection on December 17, 2021. The facility was inspected as a LQG and permitted storage facility. An out-briefing on the findings of the inspection was provided by Mr. Himes and Ms. Goodwin to Matthew Doty and Mark Yanchisan, Assistant Director for Research Support Services.

13) Signed

DARYL
HIMES

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DARYL HIMES
Date: 2022.01.21 18:04:42
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Daryl R. Himes
Inspector and Author of Report

Date

14) Concurrence and Approval

ARACELI
CHAVEZ

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Date: 2022.01.24
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Araceli B. Chavez
Chief
RCRA Enforcement Section

Date