

RCRA Inspection Report

1) Inspector and Author of Report

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U.S. Environmental Protection Agency, Region 4
Enforcement and Compliance Assurance Division
Chemical Safety and Land Enforcement Branch
RCRA Enforcement Section
61 Forsyth Street, S.W.
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2) Facility Information

Auburn University
971 Camp Auburn Road
Auburn, AL 36849

EPA ID#: ALD000826958
NAICS #: 61131 – Colleges, Universities, and
Professional Schools
54171 – Research and Development in the
Physical, Engineering, and Life Sciences
54194 – Veterinary Services
92614 – Regulation of Agricultural Marketing
and Commodities

3) Responsible Officials

Tom Hodges
Program Manager for Environmental
Health and Safety
HodgeTF@Auburn.edu

4) Inspection Participants

Steve Nelson, Auburn University
Tom McCauley, Auburn University
Tom Hodges, Auburn University

Tarin Tischler, US EPA
Rahne Hicks, ADEM
Lee Gunter, ADEM

5) Date of Inspection

9:48 AM, June 14, 2023

6) Applicable Regulations¹

Resource Conservation and Recovery Act (RCRA) Sections 3002 (42 U.S. Code – Annotated U.S.C.A. 6925 and 6927), and 40 Code of Federal Regulation (C.F.R.) Parts 260 - 270, 273, 278, & 279; and Alabama Hazardous Waste Management and Minimization Act of 1978, Ala. Code § 22-30-1 et seq., and rules 335-14-1 to 335-14-17 (2016 and 2018) of the Alabama Department of Environmental Management (ADEM) Administrative Code (ADEM Admin. Code).

Pursuant to ADEM Admin. Code 335-14-1-.02-(1)(a)111 [40 C.F.R. § 260.10], a large quantity generator of hazardous waste (LQG) is a generator who generates greater than or equal to 1,000 kilograms (2,200 pounds) of non-acute hazardous waste in a calendar month.

¹ As the State's authorized hazardous waste program operates in lieu of the federal RCRA program, the citations of those authorized provisions will be to the authorized State program. However, for ease of reference, the federal citations will follow in brackets.

Pursuant to ADEM Admin. Code r. 335-14-11-.02(1)(a)244 [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, lamps, or aerosol cans, calculated collectively) at any time.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(5)(a) [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 any 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 22-30-12(b) of the AHWMA, Ala. Code § 22-30-12(b) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with ADEM Admin. Code r. 335-14-3-.01(6)(b) or 335-14-3-.01(7)(a) [40 C.F.R. § 262.16(b) or § 262.17(a)], except as required in ADEM Admin. Code r. 335-14-3-.01(5)(a)7. and 8. [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in ADEM Admin. Code r. 335-14-3-.01(5)(a) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the “SAA Permit Exemption”).

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7) [40 C.F.R. § 262.17], an LQG may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Section 22-30-12(b) of the AHWMA, Ala. Code § 22-30-12(b) [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in ADEM Admin. Code r. 335-14-3-.01(7) [40 C.F.R. § 262.17] (hereinafter referred to as the “LQG Permit Exemption”).

7) **Purpose of Inspection**

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine Auburn University’s compliance with the applicable requirements of RCRA and the corresponding ADEM regulations. This was an EPA lead inspection.

8) **Facility Description**

Auburn University is a public university located in Auburn, AL. The university was founded in 1856 and has a sister campus in Montgomery. Auburn University occupies 1,800 acres and is connected to Auburn waste and sewer. The facility has an NPDES permit and a registered underground storage tank.

Auburn University initially notified with the EPA a large quantity generator via 8700-12 form on March 1, 1990. The facility most recently notified as a large quantity generator on January 30, 2023. The facility generates hazardous waste in the various research classes and laboratories throughout campus as well as the campus auto shop, including waste exhibiting the hazardous waste characteristics of corrosivity (EPA Waste Code: D002) and toxicity (EPA Waste Code: D004-D043). Waste generated in the laboratories are lab packed and shipped for disposal by US Ecology. Auburn University also generates hazardous waste in the campus pharmacy. Potentially creditable hazardous waste pharmaceuticals generated here are shipped for manufacturer credit by Amerisource Bergen. Non-creditable hazardous waste pharmaceuticals are shipped for disposal by Inmar.

9) **Previous Inspection History**

Alabama Department of Environmental Management (ADEM) has conducted four RCRA CEIs at the subject facility between 2019 and 2022 and found eight violations during those inspections: three violations in 2019, two in 2020, and three in 2021.

On May 3, 2023, ADEM conducted the most recent RCRA CEI at the subject facility and found no apparent violations of RCRA's requirements.

10) Opening Conference

On June 14, EPA inspector Tarin Tischler, accompanied by Alabama Department of Environmental Management (ADEM) inspectors Rahne Hicks and Lee Gunter, arrived at Auburn University's Building 9 - risk management and safety (hereinafter Auburn or facility) at 9:48 AM. Tom McCauley, Associate Director for Environmental Health and Safety (EHS), immediately received the inspectors. Tom McCauley and the inspectors were joined by Tom Hodges, EHS Program Manager, and Steve Nelson, EHS Director, for the opening conference. The inspectors introduced themselves, showed their credentials to the facility representatives and explained the purpose of the visit.

The inspectors described the anticipated use of equipment [digital camera] during the inspection and provided a request for records. The facility did not appear to meet the Small Business Regulatory Enforcement Fairness Act's classification of a "small business." A copy of the EPA's information sheet for small businesses can be found at <https://www.epa.gov/sites/production/files/2017-06/documents/smallbusinessinfo.pdf>. The EPA inspector also discussed the company's ability, pursuant to 40 C.F.R. § 2.203, to assert a business confidentiality claim for information submitted to EPA. Auburn University did not assert a business confidentiality claim.

Tom Hodges provided an overview of the facility's history and current operations during the opening conference. The inspection participants also discussed health and safety protocols and required personal protective equipment before the Facility representative led the inspectors on a tour of the Facility operations.

11) Inspection Observations

Facilities Management - Auto and Paint Shop, Building 4:

Building 4 is located within the university's facilities management area. This building is used as a paint storage area for maintenance on campus. Painting is performed by facilities management, and waste paint generated in these operations is managed by the environmental health and safety (EHS) team. Facilities management personnel consolidate waste paint cans here to be sorted by EHS. Paint is sorted between oil-based paint and nonhazardous latex paint and placed into cubic yard boxes for shipment.

At the time of the inspection, inspectors observed one closed, unlabeled 30-gallon drum of waste paint thinner. This drum was marked with a proper hazardous waste label on-site. Inspectors also observed a pallet of 34 spent paint cans, 3-5 gallons each (Photo #1). Facility representatives informed inspectors that the paint was latex and nonhazardous; however, after separating the paint cans inspectors observed one unlabeled can of waste acrylic paint. Facility personnel

corrected this on site and marked the can with the words “Hazardous Waste, flammable liquid” and an accumulation date.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)5(i) [40 C.F.R. § 262.17(a)(5)(i)], which is a condition of the LQG Permit Exemption, a generator must mark or label its containers with the following: (A) the words “Hazardous Waste”; (B) an indication of the hazards of the contents; (C) and the date upon which each period of accumulation begins clearly visible for inspection on each container.

Pursuant to [ADEM Admin. Code r. 335-14-3-.01(2)] [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in [ADEM Admin. Code r. 335-14-2-.01(2)] [40 C.F.R. § 261.2], must make an accurate determination as to whether that waste is a hazardous waste in order to ensure wastes are properly managed according to applicable RCRA regulations articulated in [ADEM Admin. Code r. 335-14-3-.01(2)] [40 C.F.R. § 262.11].

Facilities Auto Shop:

The facilities auto shop operates as a repair and maintenance shop for Auburn fleet vehicles. Waste generated in this area includes spent lead acid batteries, which are shipped and recycled by Veolia, and used oil which is shipped and recycled by Universal Environmental Services. Inspectors observed a 250-gallon tank labeled “Used Oil” in this area.

Materials Management Building – Supply Shop:

Universal waste generated on campus is consolidated and stored prior to shipment in the material management building. Inspectors observed the following universal waste containers stored in this area:

- One cubic yard box labeled non-PCB Ballasts.
- One covered pallet holding car batteries.
- 33 two-, four-, and eight-foot boxes of universal waste lamps. These boxes were marked with the words “Auburn University Recycles, used lamps” and marked with an accumulation date demonstrating less than one year of accumulation. Two of these boxes were open at the time of the inspection, and these boxes were closed on site.

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Pursuant to ADEM Admin. Code r. 335-14-11-.02(4)(d)(1) [40 C.F.R. § 273.13(d)], a SQHUW must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions.

90-Day or less Accumulation Area:

Auburn University’s 90-Day or less accumulation area is adjacent to an office area storing the facility’s RCRA records. Within this office space, inspectors observed a storage area for household hazardous waste batteries collected from students on campus. The facility’s EHS personnel collect waste batteries and electronic waste on campus and sort and package them here. The RCRA exempt household hazardous waste is shipped for recycling by Viatek in

Tampa, FL. Facility representatives informed inspectors that all waste generated on campus is shipped by truck; however, the EHS staff is also trained to ship hazardous materials by air because some lab samples require air shipment, including DNA, RNA, iron powder, and some infectious materials.

The facility's central accumulation area (CAA) for hazardous waste is located within one warehouse separated into two separate rooms, one room for Main Waste Storage and one room for Flammable Waste Storage. Waste generated in various satellite accumulation areas across campus, primarily waste generated in campus laboratories, is brought to the 90-day accumulation area by EHS personnel. SAA containers (30-gallons or less) are marked with labels that include the words "hazardous waste" and a list of potential RCRA hazardous waste characteristics (i.e. ignitability, corrosivity, reactivity, or toxicity). Facility personnel mark the label with a checkmark next to the applicable hazard to indicating the hazard(s) of their contents during waste accumulation. When these containers are full, laboratory personnel date the container and contact EHS staff to transfer to the 90-Day or less accumulation area. The laboratory personnel input the composition of the container and then print and apply a paper label during this transfer, which is marked with the words "hazardous waste," an indication of the hazards of the contents, the accumulation date, the DOT class, the percent composition of the material, and a generator signature. The containers are then staged on shelves 3-4 days before the facility's hazardous waste transporter arrives to perform the lab pack.

The area was identified with a sign which read "danger, hazardous waste storage." Auburn manages ignitable liquids in one section and all other hazardous waste in another section of the CAA. Inspectors observed "No Smoking" signs outside the CAA. The CAA is equipped with an internal communications or alarm system capable of providing immediate emergency instruction to facility personnel; it is equipped with a device capable of summoning emergency assistance from local police departments, fire departments, or state or local emergency response teams; it is equipped with portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment; and it is equipped with water to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray system.

- Main 90-Day or Less Central Accumulation Area:

Containers were staged in this area for US Ecology to lab pack and ship for disposal. Inspectors observed shelves marked with a "Corrosive," "Toxic," "Oxidizer," "Flammable Solid," or "Class 9 Miscellaneous" DOT placards. Waste containers brought to this area are staged on the shelf with its corresponding hazard awaiting lab packs. All containers, including the Class 9 shelf, were individually marked with the words "hazardous waste," the appropriate indication of the hazards of the contents, and an accumulation date.

At the time of the inspection, the facility's hazardous waste transporter was on-site in the 90-Day or less accumulation area performing a lab pack to be shipped for disposal. Inspectors observed over 3200 small containers awaiting lab packs. The containers of waste laboratory chemicals ranging from 2L to 1ml in capacity were staged on carts to be consolidated in larger labeled drums during the lab pack (Photo #2). The transporter removed the paper labels on the containers just before consolidation.

- Flammable 90-Day or less central accumulation area:

All flammable liquid waste containers are stored in this area. At the time of the inspection, inspectors observed containers with the same paper labels as in the main storage area.

Containers in the flammable 90-Day or less area ranged from 1L to 30-gallons. Facility representatives informed inspectors that SAA's on campus are no more than 30-gallons to comply with the 55-gallon accumulation limit for SAA's. Inspectors observed a 30-gallon container marked with the words hazardous waste, flammable and toxic, TCE (Trichloroethylene.) This container was not marked with an accumulation date. Inspectors also observed three 1-gallon containers labeled "Hazardous Waste, Xylaene Substitute, t x-limonene, flammable." These containers were also missing an accumulation date. Facility representatives informed inspectors that all containers were consolidated in the 90-Day or less accumulation area on Friday, and this date was added to the labels on site (Photo #3).

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)5(i) [40 C.F.R. § 262.17(a)(5)(i)], which is a condition of the LQG Permit Exemption, a generator must mark or label its containers with the date upon which each period of accumulation begins clearly visible for inspection on each container.

Harrison College of Pharmacy:

The Harrison College of Pharmacy is the pharmacy school at Auburn University located on the northeast side of campus. The pharmacy school consists of classrooms and lecture halls for classes within the pharmacy school, as well as pharmacy laboratories and a pharmacy for students on campus. Waste is generated in the laboratories and the pharmacy.

Pharmacy:

Inspectors were greeted in the pharmacy by Paige Patterson, Assistant Director of Business Operations, and Sarah Kimble, Lead Pharmacy Tech. Facility representatives informed inspectors that waste is generated in this area when pharmaceuticals expire and cannot be returned for manufacturer credit, or when a pharmaceutical is dropped or damaged in the pharmacy. There is also a household pharmaceutical collection box just outside of the pharmacy. Customers can dispose of exempt household hazardous waste pharmaceuticals in this container, which is completely serviced by Inmar. Facility representatives informed inspectors that this container is locked at all times and only Inmar personnel have access.

At the time of the inspection, inspectors observed a closed, unlabeled 10-gallon plastic container accumulating non-creditable hazardous waste pharmaceuticals. Inspectors requested photo documentation of this container properly labeled with the words "Hazardous Waste Pharmaceuticals" following the inspection. Facility representatives informed inspectors information on all hazardous pharmaceuticals sold at the facility are maintained in a binder on site. Non-creditable hazardous waste pharmaceuticals are picked up every 3-6 months by Inmar. Potentially creditable hazardous waste pharmaceuticals sent for manufacturer credit by reverse distributor Amerisource Bergen. Inspectors reviewed the most recent shipment documentation from Inmar and Amerisource Bergen while in the pharmacy area.

Pursuant to ADEM Admin. Code r. 335-14-7-.16(2)(e) [40 CFR 266.502(e)] a healthcare facility must label or clearly mark each container of non-creditable hazardous waste pharmaceuticals with the phrase "Hazardous Waste Pharmaceuticals."

Pharmaceutical Laboratories:

Auburn University manages multiple SAAs in laboratories in the Harrison College of Pharmacy for a variety of hazardous wastes. Inspectors requested a walkthrough of some of these laboratories. Facility representatives informed inspectors that while most of the waste generated in the laboratories are non-acute hazardous wastes, some P-listed waste is generated. Containers holding P-listed waste are lab packed and shipped with the waste or triple rinsed prior to disposal. Rinsewater generated during triple rinsing is disposed of as P-listed waste. The inspectors observed the following waste containers throughout the walk through:

Laboratory 3205:

Laboratory 3205 is a formulation laboratory that conducts testing for drug formation design. Organic solvent waste is generated in this area with the hazardous characteristics for corrosivity and ignitability. Inspectors observed three satellite accumulation containers in this laboratory. Containing an acetonitrile, methanol and water solution. These containers were closed when not in use and labeled with the words “Hazardous Waste, Corrosive, Flammable.”

Laboratory 4202:

Laboratory 4202 is split into two sections, the Riese Lab and the Mitra Lab. In the Riese Lab, inspectors observed a fume hood storing an open glass baking dish container labeled hazardous waste, EtBr waste, toxic. Inspectors requested laboratory personnel close this container. In the Mitra Lab, inspectors observed one 1-Liter container of waste methanol. This container was labeled with the words “Hazardous Waste” and an indication of the hazards of the contents, however this label was partially torn and not fully legible (Photo #5). A new label was added at the inspectors’ request onsite.

Pursuant to [ADEM Admin. Code r. 335-14-3-.01(5)(a)4] [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA Permit Exemption, a generator is required to keep containers of hazardous waste closed at all times during accumulation, except when adding, removing, or consolidating waste; or when temporary venting of a container is necessary for the proper operation of equipment, or to prevent dangerous situations, such as build-up of extreme pressure.

Chemistry Building:

The Chemistry Building consisted of classrooms, lecture halls, and laboratories run by the Auburn University Chemistry Department. The facility operates multiple SAAs in this building as well, throughout the various chemistry laboratories. Inspectors requested a walkthrough of some of these laboratories. The inspectors observed the following waste containers throughout the walk through:

Hill Lab – 211:

The Hill Lab manages multiple SAAs underneath fume hoods within the lab. Inspectors observed the following:

- *Hood #1*: Four approximately 500 ml bottles labeled “Hazardous Waste.” These containers were not marked with an indication of the hazards of the contents. These labels were corrected on site.

- *Hood #2*: Two 5-gallon containers labeled “Hazardous Waste.” These containers were not marked with an indication of the hazards of the contents. These labels were corrected on site.

Two 1-gallon unlabeled bottles. These bottles were labeled by laboratory personnel on site.

- *Hood #3*: Four 1-gallon containers labeled with the words “Hazardous Waste” and an indication of the hazards of the contents.

One 1-gallon container labeled “Used mineral oil.” Facility representatives informed inspectors that this container held nonhazardous waste.

- *Hood #4*: One 5-gallon, two 1-gallon, one 300 ml and one 500 ml container. These containers were marked with the words “Hazardous Waste” and an indication of the hazards of the contents.

One 300 ml container was missing a label at the time of the inspection. This was corrected on site.

Pursuant to [ADEM Admin. Code r. 335-14-3-.01(6)(b)6.(i)] [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 (i) with the words “Hazardous Waste” and (ii) with an indication of the hazards of the contents.

Ming Chen Lab – 303:

The Ming Chen Lab manages three SAAs throughout the lab. Inspectors observed the following:

SAA #1: Two 1-gallon containers labeled “Used Oil.”

SAA #2: Three 5-gallon containers labeled “Hazardous Waste, Hexane, Acetone, ignitable.”

SAA #3: One 1-gallon container labeled “Hazardous Waste, 90 hexane 10 isopropyl, ignitable.”

One 500 ml container labeled “Hazardous Waste.” This container was missing an indication of the hazards of the contents, but this was corrected on site.

One 1-gallon container labeled “Hazardous Waste, Acetal Furan, Ignitable.”

Pursuant to [ADEM Admin. Code r. 335-14-3-.01(6)(b)6.(i)] [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 (i) with the words “Hazardous Waste” and (ii) with an indication of the hazards of the contents.

Biosystems Engineering Building:

The Biosystems Engineering Building consisted of bioengineering research laboratories. The facility operates multiple SAAs in this building throughout the various laboratories. Inspectors requested a walkthrough of some of these laboratories. The inspectors observed the following waste containers throughout the walk through:

Chemical Analysis Lab 020:

Inspectors observed two 1-gallon containers closed and labeled “Hazardous Waste” and marked with an indication of the hazards of the contents.

Food Safety Engineering 026:

Inspectors observed no hazardous waste in this area as the laboratory was closed for the summer.

Biomaterials Processing and Conversion 130:

Inspectors observed one 5-gallon container labeled “Hazardous Waste, MEDH, Toluene, Phenol, Flammable.”

12) **Records Review**

The facility’s hazardous waste records were maintained in the office space of the 90-day or less accumulation area. Inspectors conducted the records review in this area.

Contingency Plan and Quick Reference Guide (QRG):

The actions that facility personnel should take in response to an emergency are described in the facility’s Contingency Plan, which was last updated in July 2021.

The plan describes actions facility personnel must take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility.

The plan describes arrangements agreed to with the local police department, fire department, other emergency response teams, emergency response contractors, equipment suppliers, local hospitals or the Local Emergency Planning Committee.

The plan lists the names and emergency telephone numbers for persons identified as emergency coordinators. Steve Nelson is listed as the primary emergency coordinator, and Tom McCauley is listed as the alternate.

The plan includes a list of all emergency equipment at the facility. The list includes fire extinguishing systems, spill control equipment, communications and alarm systems, and decontamination equipment. The list appears to be up to date. The plan includes the location and a physical description of each item on the list, and a brief outline of its capabilities.

The plan includes an evacuation plan for personnel. This plan describes signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes.

A copy of the Contingency Plan was most recently submitted to the Lee County Emergency Management, City of Auburn Fire Department, East Alabama Medical Center, and Auburn University Security in July 2021. The facility could not provide a quick reference guide of the Contingency Plan at the time of the inspection.

Pursuant to ADEM Admin. Code r. 335-14-3.14(10)(b) [40 C.F.R. § 262.262(b)], a large quantity generator must submit a quick reference guide of the contingency plan to the local emergency responders identified at paragraph (a) of this section or, as appropriate, the Local Emergency Planning Committee. The quick reference guide must include the following elements: (1) The types/names of hazardous wastes in layman's terms and the associated hazard associated with each hazardous waste present at any one time (e.g., toxic paint wastes, spent ignitable solvent, corrosive acid); (2) The estimated maximum amount of each hazardous waste that may be present at any one time; (3) The identification of any hazardous wastes where exposure would require unique or special treatment by medical or hospital staff; (4) A map of the facility showing where hazardous wastes are generated, accumulated and treated and routes for accessing these wastes; (5) A street map of the facility in relation to surrounding businesses, schools and residential areas to understand how best to get to the facility and also evacuate citizens and workers; (6) The locations of water supply (e.g., fire hydrant and its flow rate); (7) The identification of on-site notification systems (e.g., a fire alarm that rings off site, smoke alarms); and (8) The name of the emergency coordinator(s) and 7/24-hour emergency telephone number(s) or, in the case of a facility where an emergency coordinator is continuously on duty, the emergency telephone number for the emergency coordinator.

Training Records:

The inspectors reviewed facility job descriptions and employee names that were provided for the EHS team. Each description included the requisite skill, education, or other qualifications, and duties of facility personnel assigned to that position.

Auburn provided a written description of the type and amount of both introductory and continuing training to be given to each person filling the positions listed above. The inspectors reviewed records of employee hazardous waste training for the following employees: Tom McCauley, Steve Nelson, Tom Hodges, Billy Cannon, Somchai Segrist, Michael Feeman, and Steven Nolen.

Waste Manifest and Land Disposal Restriction (LDR) Records:

The inspectors reviewed available hazardous waste manifest records and land disposal restriction forms for shipments of hazardous waste sent since the date of the last ADEM inspection, September 15, 2021. Uniform Hazardous Waste Manifests (UHWM) are signed by Billy Cannon and Somchai Segrist. Hazardous waste manifest records show that D001, D035 hazardous waste paint related material, F003, F005, and D001 hazardous waste flammable liquids, and D002 hazardous waste corrosive liquids are routinely shipped to US Ecology Tampa, Inc. (EPAID: FLD981931494) and US Ecology Sulligent, Inc. (EPAID: ALD983177015). The most recent shipment available for review at the time of the inspection was shipped on March 17, 2023 and documented on UHWM tracking number: 024263157JJK.

Facility representatives informed inspectors that pickups are scheduled every 80 days to assure compliance with the 90-day accumulation time limit for large quantity generators.

Weekly Inspection Records:

The inspectors reviewed Auburn University's available records of inspections of the hazardous waste central accumulation area (CAA) since the date of the last ADEM inspection, September

15, 2021. The facility performs weekly inspections of the Main 90-day or less accumulation area and the Flammable 90-day or less accumulation area. The inspection log includes a checklist to record observations about leaking containers and for deterioration of containers caused by corrosion or other factors. Employees routinely record inspection observations and subsequent follow-up actions on the inspection log.

Waste Determination Records:

Inspectors reviewed the facility waste profiles from US Ecology for nonhazardous latex paint generated in facilities management (Profile #: 626246) and waste corrosive liquids, toxic generated in some of the laboratory SAA's (Profile #: 768998), and the waste profile for crushed universal waste bulbs. Facility representatives informed inspectors that sister institutions, such as Auburn University – Montgomery, have the same profiles under US Ecology.

13) Closing Conference

The inspectors conducted the exit meeting with Steven Nelson, Tom McCauley, Tom Hodges, and Somchai Segrest. During this meeting, the inspectors stated their preliminary conclusions of the inspection. Auburn University agreed to provide the requested photo documentation by July 1, 2023. On August 2, 2023, ADEM submitted a warning letter to the facility.

14) List of Appendices

Appendix 1 – Photo Log:

15) Signed

TARIN TISCHLER Digitally signed by TARIN TISCHLER
Date: 2023.08.25 14:05:04 -04'00'

Tarin Tischler
Life Scientist

16) Concurrence

ARACELI CHAVEZ Digitally signed by ARACELI CHAVEZ
Date: 2023.08.25 14:47:52 -04'00'

Araceli B. Chavez
Chief
RCRA Enforcement Section

Appendix 1 – Photo Log

5 Photos taken on: June 14, 2023

Photos taken by: Rahne Hicks

Photos taken with: ADEM digital camera



Photo #1 – waste paint cans and unlabeled 30-gallon container of paint thinner consolidated in Building 4. Inspectors observed one acrylic waste paint can was not marked with a hazardous waste label.



Photo #2 – Waste in the Main 90-Day or less central accumulation area staged on carts during a lab pack.



Photo #3 – Date being added to hazardous waste container in the Flammable CAA.

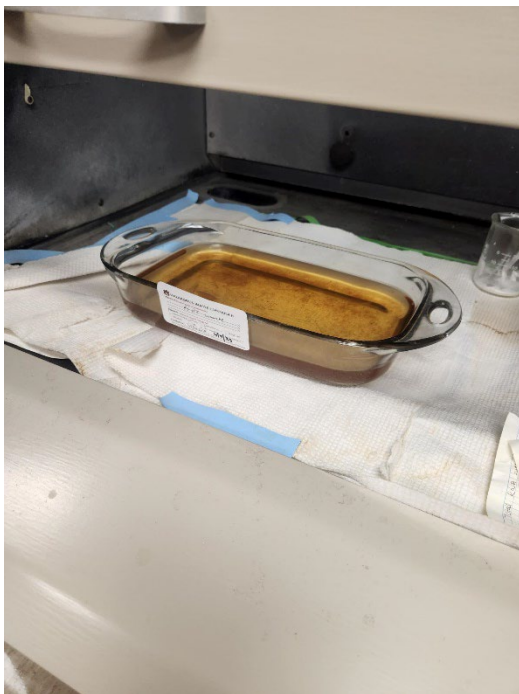


Photo #4 – Open SAA container in the Riese Lab located in room 4202 of the Pharmacy College.



Photo #5 – Container with torn and partially illegible label observed in the Mitra Lab located in room 4202 of the of the Pharmacy College.