

RCRA Inspection Report

1) Inspector and Author of Report

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2) Facility Information

Centers for Disease Control and
Prevention (CDC)
4770 Bufford Highway
Atlanta, Georgia 30341

EPA ID#: GA6750911970
NAICS #: 621511 - Medical Laboratories,
923120 - Administration of Public Health
Programs

3) Responsible Officials

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4) Inspection Participants

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5) Date of Inspection

December 18, 2024, 9:05 AM

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; Georgia Hazardous Waste Management Act, Ga. Code Ann. § 12-8-60 *et seq.*, and Georgia Hazardous Waste Management Rules, Ga. Comp. R. and Regs. 391-3-11.01 to 391-3-11.18 (2016 and 2018)

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.02 [40 C.F.R. § 260.10], a generator of greater than 100 kilograms (220 lbs.) but less than 1,000 kilograms (2200 lbs.) of hazardous waste in a calendar month is a Small Quantity Generator (SQG).

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(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 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 12-8-66 of the GHWMA, Ga. Code Ann. § 12-8-66 [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.16(b) or § 262.17(a)], except as required in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15] (hereinafter referred to as the “SAA Permit Exemption”).

Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.232(b)], a small quantity generator may maintain its existing generator category during an episodic event provided that the generator complies with the conditions listed in 40 C.F.R. § 262.232(b)(1-6).

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.18 [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.

7) **Purpose of Inspection**

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine Centers for Disease Control and Prevention Chamblee Campus’s compliance with the applicable requirements of RCRA and the corresponding Georgia regulations. This was an EPA lead inspection.

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.

8) Facility Description

The Centers for Disease Control and Prevention (known hereinafter as the CDC or facility) is a federal agency tasked with protecting human health and safety through the control and prevention of disease, injury, and disability. CDC has a number of campuses located throughout the United States. The facility headquarters is located in Atlanta, Georgia.

The campus inspected and referenced in this report is located at 4770 Buford Highway in Chamblee, Georgia. This 48.5-acre property is bordered to west by the Dekalb-Peachtree Airport, bordered to the south by a Dekalb County Public Works facility, and to the north by the IRS Service Center. The additional surrounding area is residential or retail shops. The following organizations occupy the CDC Chamblee Campus - Agency for Toxic Substances and Disease Registry (ATSDR); National Center for Environmental Health (NCEH), National Center for Chronic Disease Prevention and Health Promotion (NCCDPHP), Center for Global Health (CGH), National Center for Injury Prevention and Control (NCIPC), Office of Associate Director of Communication (OADC), and Information Technology Services Office (ITSO). The facility has numerous buildings utilized for administrative offices, laboratories, a hazardous material handling building, a visitor's center, mechanical shop, parking decks, an occupational health clinic, and other support facilities. The CDC Chamblee Campus has about 4,500 employees with 100-150 that handle hazardous waste and 3 that manage hazardous waste. Most employees work in traditional 8-hour shifts. However, some labs are open 24 hours and 7 days a week. The campus is secured 24 hours and 7 days a week with full parameter fencing, video surveillance in most areas, and a staffed guard house. All buildings require badge access and are equipped with automatic locking doors.

Laboratory research and facility maintenance are the two main sources of hazardous waste generation activities. The facility is a small quantity generator (SQG) of hazardous waste. However, infrequently the generation amounts exceed the 1000 kg per month SQG limit, and the facility generates at LQG amounts during episodic events. A SQG may have one planned episodic event and one unplanned episodic event per year with proper notifications. The facility has a Hazardous Waste Contingency Plan (HWCP), revised July 16, 2024, in preparation for a potential status increase. Hazardous wastes generated at this facility include wastes with EPA waste codes of D001, D002, D004, D005, D006, D008, D009, D011, D022, D031, D035, D036, F001, F002, F003, F005, as well as various P and U listed wastes. The Central Accumulation Area (CAA) for hazardous waste is located in Building 112a, with Satellite Accumulation Areas (SAAs) in lab buildings 103, 109, and 110. According HWCP, basement closets in Building 106 and Building 137 are used for universal waste storage. The facility utilizes an in-house electronic data tracking system for all hazardous wastes and universal wastes. This system allows the generating lab or maintenance personnel to notify the hazardous waste program manager (Ontorio Brown) that waste is ready for removal from that location's SAA. The program also tracks chemical constituents and chemical constituent amounts when entered into the system by those same notifying personnel.

Noted in the 2024 HWCP, hazardous waste is collected twice weekly from SAAs and brought to Building 112a for identification, processing, and consolidation. Building 112a was specifically

constructed for storage and handling of CDC's hazardous waste. Waste consolidation is usually in drums that, when full, are stored in the CAA. The drum consolidation area and the processing room are located inside Room 111 of Building 112a. Lab packing is performed in Room 111 of Building 112a.

The most recent Hazardous Waste Generator Notification (EPA Form 8700-12), dated August 1, 2024, characterized the facility as a small quantity generator (SQG) of hazardous waste.

9) Previous Inspection History

On February 10, 2016, GAEPD conducted the most recent RCRA CEI at the subject facility and found two apparent violations of RCRA's requirements for failure to have a Hazardous Waste Contingency Plan and failure to submit a copy of the contingency plan to the local police, fire department, hospital, state, and local emergency response teams that may be called upon to provide services. The facility was returned to compliance by April 26, 2016. As a result of this violation, GAEPD issued a Notice of Violation (NOV) to CDC on March 25, 2016, and the violations were resolved.

10) Opening Conference

On December 18, 2024, EPA inspectors Devon Robinson and Kayla Acosta, accompanied by GAEPD inspector Ian Hutcheson, arrived at the CDC Chamblee Campus at approximately 9:05 AM. The inspectors stopped at the security guard house upon entering the grounds and presented credentials, along with personal identification. The inspectors were instructed to exit the vehicles while security guards conducted vehicle inspections. Once cleared, the inspectors proceeded to the visitor's center and requested a meeting with Brek Steele, CDC Associate Director. The inspectors followed required security procedures and were issued visitor badges. Shortly after arriving, Brek Steele received the inspectors. Brek Steele and the inspectors were joined by Ontorio Brown, CDC Hazardous Waste Program Manager, for the opening conference in the cafeteria area located in building 106. The inspectors introduced themselves, showed their credentials to Brek Steele and Ontorio Brown, and explained the purpose of the visit.

The inspectors described the anticipated use of equipment (smart tablet digital camera) during the inspection and provided a request for records. Brek Steele denied the use of EPA equipment for photographs and ensured all pictures would be captured by him and sent at a later date. The EPA inspector explained that the Small Business Regulatory Enforcement Fairness Act's classification of a "small business" is generally set by the Small Business Administration using the business' SIC/NAICS code and annual receipts or number of employees. 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. The company did not assert a business confidentiality claim.

Brek Steele 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 Brek Steele and Ontorio Brown led the inspectors on a tour of the Facility operations. Access to certain areas were off limits to inspectors due to the nature of the hazards or processes. The inspectors were escorted to SAAs in buildings 103 and 110, and the CAA. These areas are described in this report.

11) Inspection Observations

Building 103:

The inspectors, Brek Steel, and Ontorio Brown were joined by Amanda Serafim, OHS Manager and Joyce Rodriguez, Lab Specialist in building 103. Amanda Serafim and Joyce Rodriguez are part of the Division Safety Team and described general lab contents, instruments, testing procedures, and waste collection processes. It was explained to the inspectors that the majority of lab waste is collected directly from instruments (i.e. spectrometers) or used glassware/pipettes. Liquid wastes are stored in designated 4L-5L glass bottles within each lab near equipment and are accumulated/stored inside fume hoods throughout. Hazardous waste also includes solid debris contaminated personal protective equipment (PPE) (i.e. used gloves and disposable equipment), which are stored in designated areas.

Building 103, Lab 1103:

Inorganic and Radiation Analytical (Clean Room): The Inorganic and Radiation Analytical Toxicology (IRAT) lab located on the first floor of Chamblee building 103 processes human serum (blood and urine) samples, according to CDC personnel.

The inspectors and CDC personnel did not enter this lab but were able to see inside via large glass windows. The inspectors observed 2 large bottles attached to lab equipment by plastic tube piping and were identified as waste by CDC personnel. Each bottle observed had in-house labels identifying chemical constituents and additional hazards indication labels. A total of 8-9 waste bottles were mentioned by CDC personnel to be stored inside lab 1103. Waste in this lab was thought to have been non-regulated waste but possibly contained hazardous aqueous caustics, acids, and bases. Waste determinations and profiles for waste streams in the 1103 lab were asked about by the inspectors during the CEI and officially requested via email from inspector Devon Robinson on January 3, 2025.

Waste determination documentation was received via email from Brek Steele on January 8, 2025, for two waste streams (Instrument Waste DLS 3018 and 3040). The determinations documentation included TCLP analyses conducted by Pace Analytical dated 05/09/24 and a metals retest analysis conducted by Eurofins dated 10/02/24. Chemical constituents detailed in the lab reports did not exceed EPA limits for characteristic or listed hazardous wastes. Included in the documentation were waste profiles for each waste stream conducted by Republic Services and were dated 6/2024 and 10/2024. The profiles for each waste stated that both streams were not RCRA hazardous. Also included was a Waste Evaluation Summary conducted by CDC. The summary stated that the waste streams Method DLS 3018 Instrument Waste (urine

testing) and Method DLS 3040 Instrument Waste (metals testing in blood) are both non-hazardous.

Building 103, Lab 2324:

Organic Analytical and Toxicology Branch:

This lab area is located on level 2 of the 103 building. There are numerous fume hoods utilized throughout this lab and 4L glass waste accumulation containers were observed in three of the fume hoods. Two were labeled as “DEET-NEO Lab Waste” and one was labeled “DAPs - Flame Retardants Lab Waste” (Photos A & B). Each of the 4L glass accumulation containers had labels indicating hazards associated, chemical constituents, and were dated. Two of the three containers had funnels that were not closed completely and neither of the containers were labeled with the words “Hazardous Waste”. Additionally, contaminated or used PPE is collected and stored in containers held by a shelving unit and managed as biohazardous wastes. No other labels were noted by the inspectors. The facility was unaware of the regulatory requirement to label hazardous waste in SAAs with the words “Hazardous Waste” and stated that none of the hazardous waste collection containers located in SAAs in the labs would have those words on the labels.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [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.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)(5)(i)], 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.”

Building 110, Room 1208:

Nutrition Biomarkers Area and Hazardous Chemical Waste Collection Room:

This area is utilized for universal and hazardous wastes. The inspectors observed a shelving unit with designated areas for corrosive acids, toxics, and corrosive bases, two flammable storage cabinets, two recycling bins, and a lock box for oxidizers. Within the shelving unit was an empty 10-gallon container, a broken ultraviolet (UV) lamp and fixture with no container dated 7/16/24 (Photo E), and eight UV lamp with no container dated 9/9/24 (Photo C). Also, a 3-gallon battery collection bucket was observed with a “waste batteries” label dated 2008 and 2011. Facility personnel stated that the dates shown were incorrect and a correct date would be added. In the breakroom of this building, a 3-gal battery collection bucket was observed with “battery collection universal waste” label dated 1/29/24 (Photo L). Facility personnel stated that for each five floors there are five battery collection buckets with one located on each floor.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)(2)], which is a condition of the SAA Permit Exemption, a generator must use a container made of or lined with materials that will not react with, and are otherwise compatible with, the hazardous waste to be accumulated, so that the ability of the container to contain the waste is not impaired.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)(5)(i)-(ii)], 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.

Pursuant Ga. Comp. R. and Regs. 391-3-11-.18 [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 Ga. Comp. R. and Regs. 391-3-11-.18 [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.”

Facility personnel corrected these issues by cleaning up the broken lamp (bulbs and fixture). It was placed into a closed container, labeled, with the words “Hazardous Waste”, “Toxic”, and “D009” (Photo F). The container was taken to the central accumulation area (CAA) in building/room 112a. Also, the eight UV lamps were placed in a container and labeled “Universal waste UV lamps” (Photo D).

Building 110, Lab/Room 1201:

Nutrition Lab - Vitamins Sample Preparation Laboratory:

In this lab, the inspectors noticed three containers for caliper zephyr waste. One 4-5L amber glass bottle (Photo G), one 5L plastic container, and a condensation bottle with absorbent material. These bottles were labeled with flammable, harmful, health, and biohazard indications but were not labeled with the words “Hazardous Waste”. According to profile documentation received on 1/23/25 from CDC, the Caliper Zephyr Waste was identified with EPA waste codes D001 and F003.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)(5)(i)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers with the words “Hazardous Waste”.

Building 136-137:

Maintenance:

The maintenance building contained one tote of used oil. The tote was labeled with the words “Used Oil”, was dated 10/26/23, and was placed on top of a spill pallet for secondary containment. There was an additional 55-gallon plastic container labeled as degreaser in this

area. Outside of the maintenance building was a gasoline tank with an estimated 500-gallon capacity. No areas of concern were identified by the inspectors for in the maintenance department.

Building 112a:

Central Accumulation Area (CAA):

The outside doors and inside of the CAA had signage with the words “No Smoking”, “Danger”, and “Hazardous Waste”. The room was secured with cameras and a badge system was used to enter the area. CDC personnel stated that the room was built specifically to house hazardous waste and is equipped with secondary containment built into the concrete floor, temperature sensors, fire walls, and additional ventilation. 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, and automatic sprinklers.

The inspectors observed six 55-gallon containers along the back left wall (Photos H & I).

- One 55-gallon plastic container was labeled as non-hazardous sodium citrate hydrochloride. The container was closed and was dated 10/7/24.
- Three 55-gallon containers of methanol and toluene were labeled with the EPA codes D001, F002, F003, and F005. Each container was closed and had a flammable DOT sticker. Two containers were dated 12/6/24 and one was dated 12/17/24. All three containers were labeled with the words “Hazardous Waste”. One container was constructed of plastic material and not grounded. Two containers were metal and grounded. The plastic container appeared to be in good condition and not leaking; however, the inspectors would caution that Toluene and methanol mixtures are generally not compatible with most plastic containers and should be grounded.
- One 55-gallon plastic container was labeled with the words “used oil”, closed, and dated 12/9/24.
- One 55-gallon metal container was labeled as acetonitrile and methanol. The container was closed, grounded, and dated 12/6/24. The container had the words “Hazardous Waste”, a flammable DOT sticker, and EPA waste codes of D001, F003, and F005.

Along the back right wall was the lab pack storage area. This was two large shelving units with designated shelves for poisons, corrosives, and non-hazardous wastes. There were multiple containers on the shelves labeled as non-hazardous including used oil, anti-freeze, boric acid detergent, sodium chloride, and nitrogen gas canisters. Other containers observed on the shelving units:

Note: all containers were observed to be closed and in good condition.

- A bag of vials was managed as non-hazardous waste and labeled as fetal bovine, dimethyl sulfoxide, and glutamax dated 12/5/24.
- Two 4L amber glass containers with sodium hydroxide, hypochlorite, wash buffer, reagents, and guanidine thiocyanate dated 12/16/24 (Photo J). Both containers had labels stating they were corrosive liquids but did not have the words “Hazardous Waste”.
- One container with sodium hydroxide, potassium hydroxide, ammonium hydroxide, calcium hydroxide, and sodium carbonate dated for 12/2/24. This container had a label stating it was a corrosive liquid but did not have the words “Hazardous Waste”.
- One 1-gallon plastic container with hydronitric acid, selenium, cadmium, chromium, and lead was dated for 12/13/24. This container had a label stating it was a corrosive liquid and toxic but did not have the words “Hazardous Waste”. Hydronitric acid is generally defined as a highly reactive chemical compound and can degrade most common plastics.
- One 1-gallon plastic container with hydrochloric acid was dated for 12/4/24. This container had a label stating that it was a corrosive liquid and toxic but did not have the words “Hazardous Waste”.
- One 1-gallon plastic container with sulfuric acid dated 11/26/24. This container had a label stating that it was a corrosive liquid and toxic but did not have the words “Hazardous Waste”.
- Three 500 mL containers of acetic anhydride. One was dated 12/02/24 and two were dated 11/26/24. All three containers were marked with an indication of the hazard of the contents but were not labeled with the words “Hazardous Waste”.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.16(b)(6)(i)(A)(B)], which is a condition of the SQG Permit Exemption, a generator must mark or label its containers with the words “Hazardous Waste” and an indication of the hazards of the contents.

Along the right wall of the CAA were a series of flammable storage cabinets containing the wastes listed below:

Note: all containers were observed to be closed and in good condition.

- Seven 13 oz. plastic containers of unopened Super Sani-Cloth disinfectant/germicidal wipes dated for 12/3/24. These were labeled as flammable liquids and as hazardous wastes. The validity of the hazardous waste determination was questioned by the inspectors and documentation requested.
 - Documentation received on January 8, 2025, included a profile from Republic Services for the germicidal wipes dated 5/21/24. The profile stated that the wipes were solids containing flammable liquid (Isopropyl alcohol) and indicated a flashpoint of <90 degrees Fahrenheit triggering the EPA D001 waste code for flammability.
- Two 0.5 L amber glass containers with sodium hydroxide and methanol dated 11/29/24. These containers had no indication of hazards or a hazardous waste label.

- One 0.5 L amber glass container with hydrochloric acid 6N and acetonitrile dated 11/29/24. This container had no indication of hazards or a hazardous waste label.
- One 4L amber glass container with dichloromethylsilane dated 11/27/24. The label for this container indicated that it was flammable and corrosive but there was no hazardous waste label.
- One 4L container of extraction waste containing acetonitrile, methanol, hexane, HCL, sodium hydroxide, and toluene was dated 11/29/24. This container had no hazard indications or a hazardous waste label.
- One 10g container of flammable solids dated 11/15/24. This container had no hazardous waste label.
- One 4L amber glass container of corrosive liquid basic inorganic waste dated 12/2/2024. This container had no label with the words “hazardous waste”. Ticket ID 239765
- One 4L amber glass container of corrosive liquids waste dated 12/16/2024. This container had no label with the words “hazardous waste”. Ticket ID 240424
- One 4L amber glass container of corrosive liquids waste dated 12/16/2024. This container had no label with the words “hazardous waste”. Ticket ID 240245

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.16(b)(6)(i)(A)(B)], which is a condition of the SQG Permit Exemption, a generator must mark or label its containers with the words “Hazardous Waste” and an indication of the hazards of the contents.

Additionally, the facility manages universal waste in this area. The inspectors observed 20 boxes dated 6/25/24 of lead acid batteries. The boxes were closed, wrapped in shrink wrap, and on top of a pallet. Facility personnel reiterated that all universal waste is tracked via the in-house electronic waste tracking system.

According to the records provided on January 8, 2025, the facility shipped 3 pallets of Li-ion and lead acid batteries for recycling with Premier Surplus, Inc. on 7/25/24.

The records stated that the facility did not accumulate enough universal waste batteries to warrant shipment in 2023. The batteries from 2023 were consolidated at the Clifton Rd. Atlanta location and then sent for recycling to Premier Surplus, Inc. A bill of lading was signed on 5/25/23 to acknowledge receipt of two palettes of batteries from the CDC Clifton Rd. location to Premier Surplus, Inc.

The records indicated that there were two shipments of batteries in 2022 shipped for recycling to Premier Surplus, Inc. on 9/15/22 and 10/6/22.

12) Records Review

Contingency Plan and Quick Reference Guide (QRG):

As stated in Section 8 of this report, the facility is a small quantity generator (SQG) of hazardous waste. However, infrequently the generation amounts exceed the 1000 kg per month SQG limit, and the facility has a Hazardous Waste Contingency Plan (HWCP) with a Quick Reference Guide (QRG), revised July 16, 2024, in preparation for a potential status increase.

The HWCP (plan) and QRG detail the actions that facility personnel should take in response to an emergency and are described in the facility's plan.

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 includes emergency contact information and arrangements with the DeKalb County Police Department, DeKalb Fire Rescue Department, other emergency response teams, emergency spill response contractors (US Ecology, KEMRON Environmental Services, and Clean Harbors Environmental Services), Grady Hospital, and the Dekalb Emergency Planning Committee (LEPC).

The plan lists the names and emergency telephone numbers for persons identified as emergency coordinators. Brek Steele is listed as the primary emergency coordinator, and the other individuals are listed in the order in which they will assume responsibility as alternates.

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.

The HWCP and QRG includes the types/names of hazardous waste in layman's terms and the associated hazard associated with each hazardous waste present at any one time, the estimated maximum amount of each hazardous waste that may be present at any one time, and the identification of any hazardous wastes, where exposure would require unique or special treatment by medical or hospital staff. However, EPA recommends updating the plan to include all satellite accumulations areas.

Also included is a map of the facility that details entry/exit routes and information for where hazardous wastes are generated, accumulated, and treated. However, the diagram was last updated on July 1, 2019, and does not include the post construction layout with Building 112a (CAA). An additional satellite street map is included and shows the facility's campus in relation to surrounding businesses, schools, and residential areas.

Training Records:

SQGs must ensure that all personnel that manage hazardous waste are thoroughly familiar with the proper waste handling and emergency procedures relevant to their responsibilities during normal facility operations and emergencies. There is no specific recordkeeping requirement attached to the SQG training regulations. However, facility personnel stated that all employees

receive RCRA Hazardous Waste Training annually and additional training is required for employees that manage hazardous waste including 40-hr HAZWOPER.

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 between 2021 and 2024. Hazardous waste manifest records show that D001, F003, F005, flammable liquids (Acetonitrile and Methanol) waste, D001, F002, F003, and F005 hazardous waste for flammable and toxic liquids that contain methanol, dichloromethane (may contain residual tobacco/filters), D001, F002, F003, and F005 hazardous waste for flammable liquids (Methanol and Toluene), and D002 hazardous waste for corrosive liquid waste are routinely shipped to Us Ecology Tampa Inc. (FLD981932494), US Ecology Sulligent, Inc. (ALD983177015), and the most recent shipment was made on December 5, 2024.

Manifest 025852961JJK, shipped on 2/29/2024, listed sodium azide waste with a waste code of P105 and nicotine waste with a P075 waste code. Manifest 026458261JJK, shipped on 5/23/2024, listed P110 for 3 lbs of the chemical tetraethyl lead. Additionally, manifest 026877780JJK, shipped on 8/29/2024, listed the P105 waste code for 2lbs of sodium azide.

The inspectors requested additional information for the manifested wastes for the P105 and P075. Specifically for manifest 025852961JJK, the P105 waste code was scratched out and initialed by the hazardous waste transporter (Republic/EQ Industrial Services representative). Brek Steel explained that the P-listing on the manifest for sodium azide was an error because it is used as a preservative in laboratory testing and not the sole active ingredient in a commercial chemical product. The EPA P-listed waste codes identify acute hazardous waste reserved for when a listed chemical is the sole active ingredient in a commercial chemical product. Brek Steel also explained in more detail about the lab packing process and the tracking of waste amounts. The total weight on the manifests includes containers and packing material; however CDC personnel use lab pack sheets and internal waste ticket reports to calculate and keep record of the weight of the lab pack wastes. CDC waste technicians also keep drum logs to track wastes being consolidated into drums based on waste tickets and compatibility.

Also, according to Brek, “it is not possible to reconcile shipped drum weights with waste tickets based on our internal waste ticket reports alone. There are drum logs kept by the technicians that record what waste tickets are added to which drums. Our technicians are responsible for knowing which waste profiles are allowed to be consolidated into which drums for it to stay within spec with the DOT shipping classification. We have hundreds of waste profiles that get consolidated down to a few dozen DOT shipping classifications. Every consolidated drum is weighed before shipment to be as accurate as possible.” Drum logs were not submitted to EPA or EPD for this CEI Report. However, the internal waste tracking sheets were submitted and show proof of generation amounts but not types or amounts of wastes consolidated into shipped drums. EPA suggest streamlining this process of waste tracking.

Weekly Inspection Records:

The inspectors reviewed available records of inspections of the hazardous waste central accumulation area (CAA) from 12/30/2021 to 12/17/2024. The inspections were generally conducted by Joseph Walton, Field Chemist or Rodney Massey, Environmental Technician. No weekly inspections were noted as missing by the inspectors.

The inspection log includes a checklist to record observations about leaking containers and for deterioration of containers caused by corrosion or other factors. The inspection log includes a checklist to record observations about the waste area security, signage, emergency contacts list posted, accessibility to emergency spill control and safety equipment, adequate water volume for fire control, aisle space, free of leaks and spills, condition and compatibility of containers, closed containers, incompatible wastes, hazardous waste and hazard indication labeling, dates, universal waste labeling and dates, and visible/legible container labels.

The records include the date and time of the inspection and the name, signature and initials of the employee conducting the inspection. Employees do not routinely record inspection follow-up actions on the inspection log. The inspectors observed that on all four of most recent inspections conducted, the line-item number twelve was marked 'No' for "All waste containers are in good condition (e.g., not leaking, dented, bulged, etc.) and are compatible with waste" with no comment or corrective action listed.

Include other Records as Appropriate:

The most recent 8700-12 Form Notification was received on August 1, 2024. According to Ontorio Brown, the notification was intended to notify for an episodic generation of hazardous waste that occurred in July 2024. In July of 2024, facility documentation reports a generated amount of 1220 kg of hazardous waste exceeding the SQG monthly limit for generation of 1000 kg. However, there is no indication of an episodic event on the form.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.232(b)(2)], which is a condition of the *SQG Permit Exemption*, a generator must notify EPA no later than thirty (30) calendar days prior to initiating a planned episodic event using EPA Form 8700-12. In the event of an unplanned episodic event, the small quantity generator must notify EPA within 72 hours of the unplanned event via phone, email, or fax, and subsequently submit EPA Form 8700-12. The small quantity generator shall include the start date and end date of the episodic event and the reason(s) for the event, types and estimated quantities of hazardous wastes expected to be generated as a result of the episodic event, and identify a facility contact and emergency coordinator with 24-hour telephone access to discuss the notification submittal or respond to emergency.

13) Closing Conference

The inspectors conducted the exit meeting at around 4:00 pm with Brek Steele and Ontorio Brown. During this meeting, the inspectors stated their preliminary conclusions of the inspection. CDC agreed to provide requested records upon request by EPA or GA EPD.

On January 3, 2025, EPA inspector, Devon Robinson, requested via email to Brek Steele, all non-regulated waste profiles/determinations from Building 1103 Room 103, proof of hazardous waste generation amounts in 2024 via ticketing system and log recycling receipt for the 2000 lbs. of alcohol (hand sanitizer) on manifest 0012139 that was shipped on 08-01-2023, bills of lading for batteries (last 3 years), Sani-Cloth hazardous waste determination and SDS, and photos taken by Amanda Serafim and Brek Steele during the inspection.

In an email dated, January 8, 2025, Brek Steele provided records and explanations in response to Devon Robinson's request.

14) List of Attachments

Attachment 1 – Photo Log

15) Signed

KAYLA ACOSTA Digitally signed by KAYLA ACOSTA
Date: 2025.02.24 16:10:03 -05'00'

for Devon V. Robinson
Environmental Scientist
RCRA Enforcement Section

KAYLA ACOSTA Digitally signed by KAYLA ACOSTA
Date: 2025.02.24 16:10:32 -05'00'

Kayla Acosta
Physical Scientist
RCRA Enforcement Section

16) Concurrence

ARACELI CHAVEZ Digitally signed by ARACELI CHAVEZ
Date: 2025.02.26 12:55:41 -05'00'

Araceli Chavez
RCRA Enforcement Section

Attachment 1 – Photo Log

14 Photos taken on: December 18, 2024

Photos taken by: Brek Steele, CDC

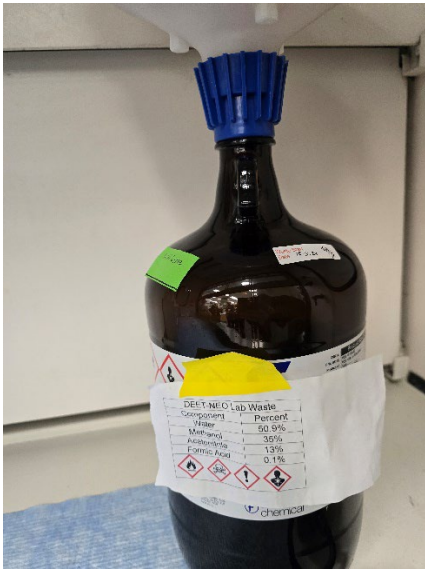


Photo A: Building 103—Deet-Neo Lab Waste

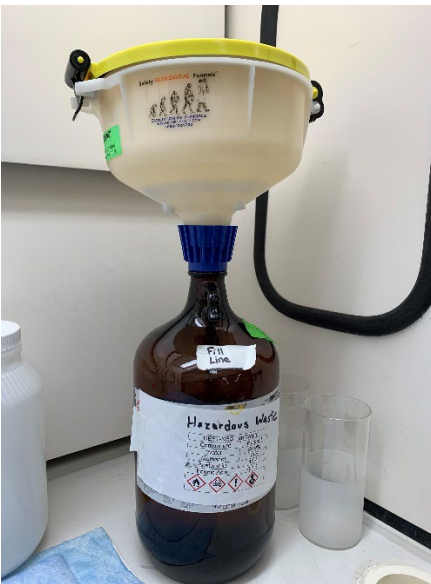


Photo B: Building 103 – Deet-Neo Lab Waste with closed lid and the words “Hazardous Waste”

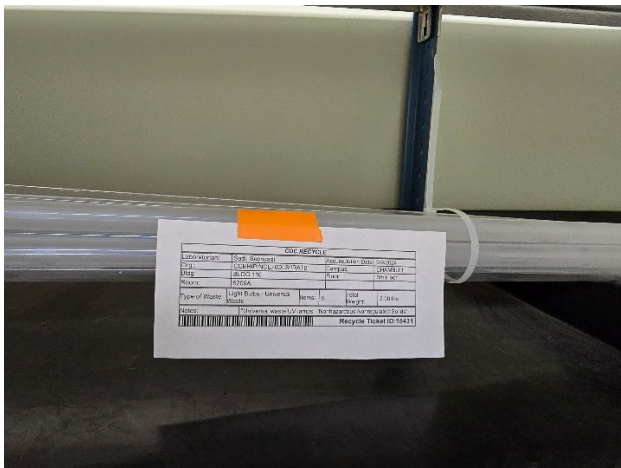


Photo C: Building 110, Room 1208—Universal waste lamps

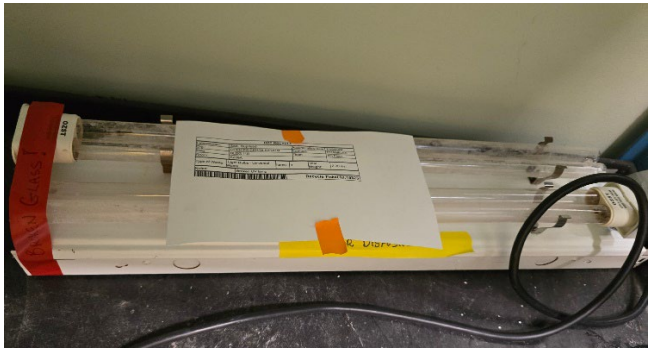
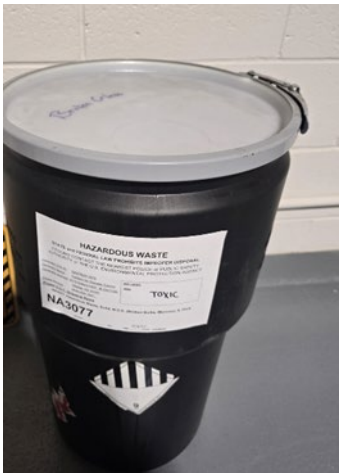
	Photo D: Building 110, Room 1208—Universal waste lamps – containerized after inspection
	Photo E: Building 110, Room 1208—Universal waste – Broken lamp
	Photo F: Building 110, Room 1208—Universal waste – Broken lamp containerized after inspection



Photo G: Building 110, Lab 1201—Caliper-Zephyr Waste



Photo H: CAA – Hazardous waste containers



Photo I: CAA – Hazardous waste (toluene and methanol), non-hazardous waste, and used oil containers

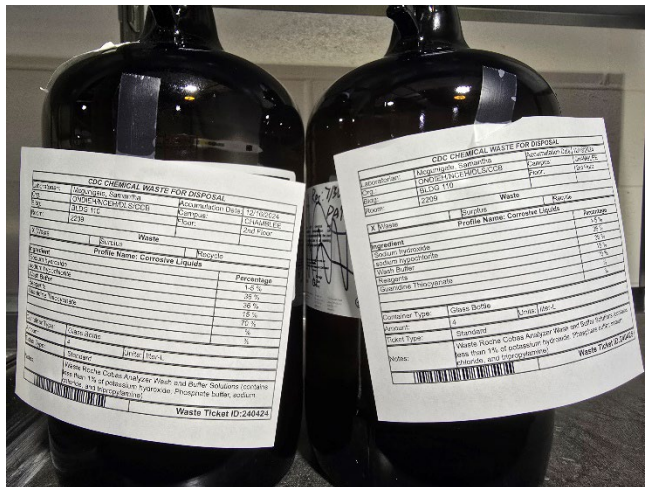


Photo J: CAA – Hazardous waste Corrosive Liquids

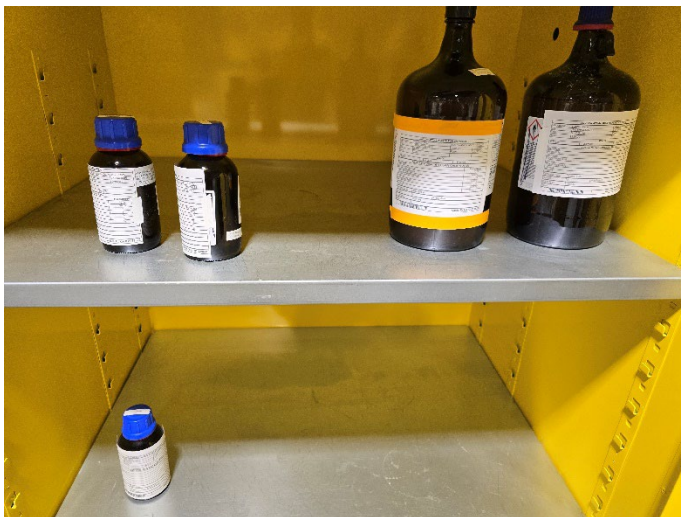


Photo K: CAA – Flammable storage cabinet with hazardous waste

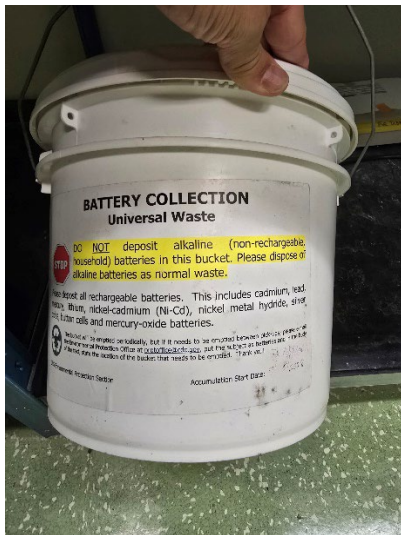


Photo L: Building 110 Break Room—Universal waste – battery collection bucket