

RCRA Inspection Report

1) Inspector and Author of Report

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2) Facility Information

University of South Alabama
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EPA ID#: ALD079474037
NAICS #: 61131- Colleges, Universities, and
Professional Schools

3) Responsible Officials

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4) Inspection Participants

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F. Anne Foster, University of South Alabama

Lee Gunter, ADEM
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5) Date of Inspection

November 19, 2024, 1:00pm CST-7:00pm CST

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; the 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); and Hazardous Waste Facility Permit ALD079474037.

Pursuant to ADEM Admin. Code r. 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.

Pursuant to ADEM Admin. Code r. 335-14-1-.02(1)(a)157. [40 C.F.R. § 273.9], a large quantity handler of universal waste (LQHUW) is a universal waste handler who accumulates 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 Alabama Hazardous Wastes Management and Minimization Act (AHWMMA), 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 AHWMMA, 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 the University of Alabama’s compliance with the conditions of its RCRA

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.

Hazardous Waste Facility Operating Permit (ALD079474037) the applicable requirements of RCRA and the corresponding Alabama regulations. This was an EPA lead inspection.

8) Facility Description

The University of South Alabama:

The University of South Alabama (USA or University) is a public, doctoral-level university operating under the NAICS Code 611310 for Colleges, Universities, and Professional Schools. The University was founded in 1963, and the main campus covers approximately 1,200 acres in Mobile, Alabama. The university consists of ten colleges and includes one of Alabama's two state-supported medical schools. It has an enrollment of about 14,000 students and a workforce of approximately 5,500 members of faculty and staff.

The Alabama Department of Environmental Management (ADEM) issued a hazardous waste operating permit to the USA for hazardous waste container storage and treatment at the University Treatment, Storage, and Disposal Building (TSD Building). The TSD Building consists of a single-story structure on the University campus in which the USA is permitted to store up to 1,500 gallons. The USA is also permitted to treat up to 300 gallons of waste per day in a neutralization tank at the TSD Building. The current hazardous waste operating permit became effective on January 24, 2020, and shall remain in effect until January 23, 2030, unless it is revoked and reissued, or it is terminated.

In addition to the hazardous waste management activities in the TSD Building, the USA is also a large quantity generator (LQG) and a transporter of hazardous waste. In the 2024 biennial report, dated February 27, 2024, the USA also notified as a large quantity handler of universal waste (LQHUW) (batteries and lamps), and as a used oil transporter. The biennial report also indicated that the USA is operating under 40 CFR 266 Subpart P for the management of hazardous waste pharmaceuticals.

Hazardous Waste Generation and Transport:

The University's research laboratories, teaching laboratories, healthcare operations, maintenance activities, and facility operations all generate hazardous wastes which may be transported from on-campus and off-campus areas to the University's permitted storage area. The USA operates teaching and research laboratories distributed through approximately 112 buildings and ten colleges, including all areas of engineering, biomedical, genetic, medical, and agricultural and natural science research studies. Each laboratory is a potential point of generation for hazardous waste. In addition, the USA provides instruction in all areas of liberal and performing arts studies, and some of those areas may also perform activities that generate hazardous waste. Finally, the USA's support services such as maintenance, grounds, motor pool and athletics also have the potential to house one or more points of generation for hazardous waste. The Grounds/Landscaping department building was closed and completely gutted. The Grounds department and associated SAA was relocated to the Transportation department building and the SAAs were combined into one.

The types of waste generated onsite include ignitable, corrosive, reactive and/or toxic waste generated in the teaching and research laboratories and waste oils, antifreeze, oil contaminated debris, outdated fertilizer, pesticides, herbicides, etc. generated during normal maintenance and landscaping activities. Laboratory generated wastes include expired chemicals as well as wastes generated from non-clinical laboratory tests, which are based on the type of individual research or classroom work and vary depending on the classes being offered during a given semester. Waste containers can be as small as a 50 ml glass bottle or as large as a 55-gallon metal drum. Wastes in most teaching and research laboratories are managed using a collection of bottles, with multiple sizes ranging up to a 5-gallon poly carboy.

The USA does not have a centralized campus wide procurement office to coordinate or control chemical purchases ordered by and received at the USA campuses. Instead, each department is responsible for its own ordering process. If an investigator/staff member determines that the use, contamination, or expiration of a given chemical has caused it to no longer be usable in their area, that person is responsible for contacting the Safety and Environmental Compliance (SEC) Department for a waste chemical pick-up. The SEC Department receives information on the type and quantity of waste that is ready to be picked up and three SEC Department employees transport all university generated wastes to the TSD Building. Hazardous waste is collected from the University Hospital every Thursday, from the USA Children's and Women's Hospital and Providence Hospital on an as needed basis, from the Chemical Stockroom at the end of each semester, and from all other SAAs upon request. Hazardous wastes are transported from each SAA to the TSD building for storage. The departments are not charged for waste services provided by the SEC. The SEC aims to recycle chemical product grade material and equipment such as pipettes and laboratory glassware when possible; product grade material may be tagged as a waste and stored in the TSD building until they can find a use for it (if not it remains a waste). In 2024, they salvaged approximately (~) 4200 items of lab equipment, valued at ~\$5,229. The University aims to complete two hazardous waste shipments from the TSD a year to stay in compliance with the one-year storage limit. This year they have already had three shipments due to closing the Grounds department which generated additional waste.

Based on information provided by the person responsible for generating a container of waste, SEC Department personnel determine and assess the chemical and physical properties of the waste to determine the proper treatment, storage, and disposal methods. The USA's in-house manifest system generates a computerized record for each waste container and this record is used to create an in-house laminated manifest card (with individual tracking number), which is affixed to the container for on-site identification and tracking of the material. Wastes that are generated at non-contiguous USA locations are transported to the TSD Building using a DOT Uniform Hazardous Waste Manifest, and an in-house laminated manifest card from the same USA in-house manifest system is affixed to each container when it arrives at the TSD Building. The computerized log provides information such as the specifically assigned manifest number; the name or general description, volume, EPA number, source location, DOT designation for the waste; the date the waste is picked up; and other information deemed necessary for proper management. The USA also enters a process code to indicate the desired treatment method on these records.

Hazardous Waste Storage:

The TSD Building is the only area on the USA main campus where hazardous wastes are stored outside of an SAA. The building, a single-story structure that was built in 1986, is enclosed within a chain-link fence that is eight-feet tall and topped with barbed wire. Only SEC Department personnel have access into the fenced area and inside the building. The floor of the TSD Building is constructed of poured concrete and it slopes down to several floor drains that connect to an underfloor storage tank through a locked-off piping system. In addition, the concrete flooring system is sealed with a chemical resistant, two-part epoxy paint coating that is applied approximately 18-36 inches up the walls.

Most containers in the TSD Building are stored in one of five individual storage bays: (1) caustic storage; (2) flammable liquid barrel storage; (3) high hazard storage; (4) chlorinated solvent storage; and (5) acid storage, but containers of highly toxic material, oxidizers, and stable organic peroxides are stored on a dedicated wooden shelving unit located next to the bays. The storage bays are separated by concrete walls and each bay is equipped with a shelving system above an obstructed pit used to capture any spilled or leaked material. Spilled or leaked material can either be recovered directly from the pit or it can be drained into the underfloor storage tank.

The TSD Building receives and manages numerous different hazardous waste profiles, and most waste arrives in containers that hold less than or equal to 5-gallons or 25-pounds of material. When vehicles transporting containers of waste arrive at the TSD Building, they are parked in the delivery area in front of the roll-up door. From there, SEC Department personnel off-load the containers directly into the building. Containers greater than 5-gallons are stored in the flammable liquid barrel storage area, and containers less than 5-gallons are staged on a set of wooden shelves according to waste classification. An in-house laminated manifest card is affixed to each container within the TSD Building, and containers less than 5-gallons are then transferred from the wooden shelves to the designated storage bay. Containers greater than 5-gallons are stored in the barrel storage area near the roll-up door.

Wastes that have been accepted at the TSD Building may continue to be stored in their incoming containers, such as the original manufacturer's container (glass, plastic, and metal) or a high-density polyethylene carboy (two-and-a-half or five-gallon capacity), until it is ready for shipment off-site. Other wastes or waste containers may be consolidated into a thirty-gallon high density polyethylene drum (both open and closed head), into a DOT-approved 55-gallon metal drum (both open and closed head), or into a fiberboard, lined drum (various sizes). For example, compatible ignitable solvents are bulked together into 55-gallon drums for off-site vendor fuel blending.

Under standard practices, barrels are stored single file in the designated bulking portion of the barrel storage area with enough aisle space for routine inspection of the containers. Once a barrel is filled, it is moved to the designated holding portion of the barrel storage area until it is shipped offsite for disposal. The bulking portion of the barrel storage area has been specifically designed to capture both spills and fumes that may be generated by the bulking process. Spilled or leaked material is captured in one of two 10-inch deep retaining pits beneath a fiberglass-

coated grating used to support the 55-gallon drums. Material that is captured in the pits can either be pumped directly into another drum or it can be released into the underfloor holding tank before it is pumped into another drum. Fumes that may occur during the bulking process are controlled by a single pass exhaust vent, which runs along the entire length of the bulking portion of the barrel storage area.

Hazardous Waste Neutralization and Disposition:

Neutralization of non-hazardous, non-EPA listed materials (salts, sugars, amino acids) and EPA hazardous (D002) listed materials (acids, bases, non-silver-containing photochemical solutions) is performed within the 250-gallon neutralization vessel in the TSD Building. The USA only uses this procedure to neutralize outdated or unwanted laboratory chemicals that do not contain any contaminants. The process may not be used to neutralize any waste that is a combination of corrosive material and other chemicals. Once materials have been neutralized, personnel check the pH before opening the release valve to discharge the effluent to the USA Sanitary Sewer System which then ultimately discharges to the City of Mobile Sanitary Sewer System. The University keeps a neutralization log recording information such as the date of neutralization, the material to be neutralized, and the starting and ending pH.

The USA SEC Department also handles the arrangements for ultimate disposal of all other hazardous and nonhazardous chemical waste materials. Disposal methods are selected based on the waste characteristics, and barrel wastes are shipped off-site once every quarter. The USA prepares lab pack shipments twice a year and evaluates the quoted price, available disposal options and company reputation/referrals before selecting the desired vendor for managing the lab pack shipment. Stericycle disposes of all USA pharmaceutical waste.

9) Previous Inspection History

The Alabama Department of Environmental Management (ADEM) and the U.S. Environmental Protection Agency (EPA) typically conduct a RCRA compliance evaluation inspection (CEI) at the subject facility every fiscal year. The most recent CEIs were conducted by the EPA and the ADEM on March 29, 2023, and December 6, 2023. Violations of hazardous waste container labeling requirements and container structural requirements were noted during the RCRA CEIs.

10) Opening Conference

On November 19, 2024, EPA inspector Alexis Wilson, accompanied by EPA inspectors Laurie Benton DiGaetano and Devon Robinson and ADEM inspector Lee Gunter, arrived at the University of South Alabama at approximately 1:00 pm CST. William Guess, Director of Safety and Environmental Compliance immediately received the inspectors, and they were soon joined by Anne Foster, Assistant Director of Safety and Environmental Compliance, for the opening conference. The inspectors introduced themselves, presented their credentials to William Guess and explained the purpose of the visit.

The inspectors described the anticipated use of equipment (digital camera) during the inspection and provided a physical document with specific records requested for review. 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 University did not assert a business confidentiality claim.

William Guess provided an overview of the facility’s history, current operations, and any changes in hazardous waste management since the previous RCRA CEI during the opening conference. The inspection participants also discussed health and safety protocols and required personal protective equipment before William Guess and Anne Foster led the inspectors on a tour of the University operations.

11) Inspection Observations

The TSD Building

The tour of the University began at the TSD Building, which is permitted to (1) store hazardous waste that is generated on the University’s main campus and generated by the University on non-contiguous properties and to (2) neutralize corrosive hazardous waste that do not contain any contaminants. The TSD Building is a single-story cinderblock structure inside a chain-linked fence topped with barbed-wire. The TSD Building is equipped with a security system that is monitored 24/7 by the USA Police Department and includes four security cameras outside of the building and an audible security alarm. The building is also equipped with portable fire extinguishers and fire hoses, and warning signs are posted on all four sides of the fence. The inspectors observed “no smoking” and “danger, chemical storage” signs in this area, a safety shower and eyewash station on the outside of the building, and an emergency telephone at the workstation in the building’s office. Cedric Crawley, Lab Specialist, was present at the TSD Building during the inspection and provided information about hazardous waste management (storage, transport, and neutralization activities).

In front of the TSD Building is a staging area which contained 15 empty drums and approximately 25 used lead acid batteries for recycling. The inspectors also observed one 30-gallon drum of hazardous waste on a dolly in the outdoor staging area. University personnel identified the contents of the container as Carson’s Solution (Photo 1). The container was labeled with hazard indicators “Corrosive” and “Flammable Liquids,” with EPA waste codes D001 and F003, and with the words “Hazardous Waste” (Photo 2). Cedric Crawley stated that one hazardous waste label with an accumulation start date of September 14, 2023, was an inaccurate label, and he removed it at the time of the inspection. A second hazardous waste label which remained on the drum had an accumulation start date of November 4, 2024 (Photo 2). Inspectors requested documentation clarifying the accumulation start date for the drum. In an email dated December 2, 2024, William Guess provided documentation detailing the volume of Carson’s Solution that was added to the 30-gallon drum and the date(s) it was accumulated. The document states that Carson’s Solution was first added to the drum on January 25, 2024, and that hazardous waste was most recently added to the container on October 14, 2024.

According to this record, both the accumulation start dates of September 14, 2023, and November 4, 2024, labeled on the drum at the time of the inspection were inaccurate.

Pursuant to Hazardous Waste Permit No. ALD079474037, Permit Condition Part III.G.1, The Permittee shall manage containers as required by ADEM Admin. Code r. 335- 14- 5-.09(4) and Part D- 1c of the permit application. Specifically, Part D-1c of the permit application states that all containers receive an in-house laminated manifest card (with individual tracking number) used for identification and allows for computerized tracking of all waste materials. This tracking method includes a receiving date that allows for disposal within the allotted time frame called for in this permit.

In the processing area of the TSD building, the inspectors observed 12 55-gallon drums lined up in three rows of four (Photo 3). Facility personnel stated that waste containers in the TSD building are typically labeled in accordance with the permit requirements when they are in storage. Before the transporter arrives, hazardous waste drums are lined up in the process area to prepare for shipment. Regarding these 12 hazardous waste drums, the containers were originally scheduled to be transported off-site, but the waste pick-up was cancelled due to USA's concerns about the transporter employee's training, qualifications, and job performance. Typically, when the transporter comes to pick up the waste, they relabel them with the transporter's hazardous waste labels for transportation and the DOT toxic hazard stickers are removed from the containers of hazardous waste solvent that are considered toxic under RCRA, but not under DOT. The original transporter had processed some, but not all, of the twelve containers that were to be included in the waste pick-up, removing the facility's labels and toxic indicators.

As such, inspectors observed eleven containers labeled with the words "hazardous waste," and one container labeled non-regulated DAB solution. Containers of hazardous waste were also labeled with waste codes D001, F003, and F005. There were three hazardous waste drums of Carson's Solution, one drum of non-regulated DAB solution, six hazardous waste drums of xylene and mixed alcohol, and two hazardous waste drums of xylene and toluene. Nine of the 12 drums were labeled with an accumulation start date; the dates observed were November 1, 2024, November 4, 2024, and November 14, 2024. Three of the drums were not labelled with accumulation start dates.

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All eleven containers of hazardous waste were labeled with a flammable hazard indicator. Two hazardous waste drums of xylene and toluene were also labeled with DOT toxic indicators. The remaining nine hazardous waste drums were not labeled with toxic hazard indicators (Photo 4).

Pursuant to Hazardous Waste Facility Permit No. ALD079474037, Permit Condition Part II.L.1 of, the Permittee shall maintain compliance with the requirements of 40 CFR 268 as adopted in ADEM Admin. Code r. 335- 14- 9. Specifically, 40 CFR 268.50(a)(2)(i)(C) as adopted in ADEM Admin. Code r. 335- 14- 9, requires each container of hazardous waste restricted from land disposal to be clearly marked to identify its contents and with an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

Facility personnel expressed the drums were slated to be transported off-site by the end of the week and provided documentation on December 2, 2024, at the request of the inspectors, that the shipment was initiated on November 20, 2024 (Manifest #026560669JJK).

The inspectors observed a neutralization tank which appeared to be in good condition and was empty at the time of the inspection (Photo 5). According to the neutralization log, which is kept in the TSD building, it was last used to neutralize Hier Solution on October 14, 2024.

The inspectors observed 7 containers of universal waste batteries (five 30-gallon drums, one 5-gallon bucket, one small <5-gallon bucket) (Photo 6). The contents include two containers of used lithium batteries, two containers of used alkaline batteries, one container of used Ni-Cd batteries, one container of used zinc batteries, and one container labeled “odd group of dead batteries”. Each container was tagged with the facility’s internal manifest system tag and a universal waste label. The inspectors observed accumulation start dates of November 6, 2024, and September 9, 2024, on the containers.

To the right of the entrance, inspectors observed four 30-gallon hazardous waste drums (Photo 7). Drum 1 was closed, in good condition, labeled with the words “hazardous waste,” flammable and toxic indicators, and an accumulation start date. Drum 2 was closed, in good condition, labeled with the words “hazardous waste,” flammable and toxic indicators, and an accumulation start date. Drum 3 contained ethidium bromide gels (non-RCRA regulated but the facility is managing it as hazardous waste), it was closed, in good condition, labeled with the words “hazardous waste,” an accumulation start date, but was not labeled with a hazard indicator. A poison hazard indicator was added by facility personnel at the time of the inspection. Drum 4 contained acetone, ethanol, and other toxic chemicals. It was closed, in good condition, labeled with the words “hazardous waste,” and an accumulation start date, but was not labeled with an indication of the hazards of the contents. Flammable and toxic hazard indicators were added by facility personnel at the time of the inspection.

Pursuant to Hazardous Waste Facility Permit No. ALD079474037, Permit Condition Part II.L.1 of, the Permittee shall maintain compliance with the requirements of 40 CFR 268 as adopted in ADEM Admin. Code r. 335- 14- 9. Specifically 40 CFR 268.50(a)(2)(i)(C) as adopted in ADEM Admin. Code r. 335- 14- 9, requires each container of hazardous waste restricted from land disposal to be clearly marked to identify its contents and with an indication of the hazards of

the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

The inspectors also observed 5 containers (one 30-gallon and four 55-gallon drums) on top of a catch basin (Photo 8). Container 1, a 55-gallon drum, was empty and labeled for storing hazardous waste containing xylene. Container 2, a 55-gallon drum, was labeled as non-regulated material (313 Diaminobenzidine). Container 3, a 55-gallon drum, was labeled as non-hazardous waste.

Container 4, a 55-gallon drum containing hazardous waste Carson's Solution, was unlabeled (no hazardous waste label, hazard indicators, or waste codes) with a hose attachment connected.

Pursuant to Hazardous Waste Permit No. ALD079474037, Permit Condition Part II.L.1, the Permittee shall maintain compliance with the requirements of 40 CFR 268 as adopted in ADEM Admin. Code r. 335- 14- 9. Specifically, 40 CFR 268.50(a)(2)(i)(a-d) as adopted in ADEM Admin. Code r. 335- 14- 9, requires each container of hazardous waste restricted from land disposal to be clearly marked to identify its contents and with the words "hazardous waste," the applicable EPA hazardous waste number(s) (EPA hazardous waste codes) in subparts C and D of part 261 of this chapter; or use a nationally recognized electronic system, such as bar coding, to identify the EPA hazardous waste number(s), an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704), and the date each period of accumulation begins.

Container 5, a 30-gallon drum, was labeled with a hazardous waste label and corrosive indicator, but it did not have an accumulation start date. Cedric Crawley described that he was in the process of adding excess Carson's Solution from the 55-gallon unlabeled drum to the 30-gallon consolidation drum when inspectors arrived to view the facility. He stated he planned to add an accumulation start date of November 19, 2024, to the 30-gallon drum.

Pursuant to Hazardous Waste Permit No. ALD079474037, Permit Condition Part III.G.1, The Permittee shall manage containers as required by ADEM Admin. Code r. 335- 14- 5-.09(4) and Part D- 1c of the permit application. Specifically, Part D-1c of the permit application states that all containers receive an in-house laminated manifest card (with individual tracking number) used for identification and allows for computerized tracking of all waste materials. This tracking method includes a receiving date that allows for disposal within the allotted time frame called for in this permit.

The TSD building also contains several wooden shelving units for additional hazardous waste materials: shelving unit one for flammable materials held approximately 25 containers (Photo 9). Shelving unit two for toxic chemicals held ~20 containers (Photo 10). Shelving unit three for acids held ~ 40 containers (Photo 11). Shelving units four and five combined contained ~30 5-gallon buckets all containing the same material from a shipment on November 11, 2024 (Photo 12 and 13). Shelving unit six, for toxic solids or liquids, held ~15 containers (Photo 14). For the containers on all wooden storage shelves, all were tagged with the facility's internal manifest tracking system labels, accumulation dates were less than a year, containers were in good condition, and shelves and/or labels included indication of hazards. In addition, near the toxic chemical shelf, inspectors observed one 30-gallon hazardous waste drum in good condition, labeled with the words "hazardous waste," corrosive indication of hazard, waste codes, and an accumulation start date (Photo 15).

Next to shelving unit two, the inspectors observed one 30-gallon drum containing lead vests that was labeled with waste code D008, an accumulation start date, and a hazardous waste label. The container was not marked with an indication of the hazards of the contents (Photo 16). A Toxic indicator label was added at the time of the inspection.

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Science Laboratory Building SAAs

The University has a Chemistry Stockroom (Room 201) in the Science Laboratory Building, which is managed by Jessica Taylor, Chemistry Stockroom Manager. The stockroom accumulates hazardous waste that may be generated in teaching laboratories, the 202 Solvent Room, and/or the 201 Chemistry Stockroom. Hazardous wastes are also generated whenever chemicals in the stockroom become expired or unwanted. Hazardous waste that is generated in the Science Laboratory Building is transported to the Chemistry Stockroom and either consolidated into a carboy or kept in a smaller container and stored in one of two waste cabinets. At the end of each semester, personnel perform a waste cleanout event to ensure all hazardous waste has been removed from the chemistry laboratories.

The inspectors observed the Chemistry Stockroom which contained a mobile cart containing 6 carboys containing hazardous waste such as Malonic Acid, Sodium hydroxide, and Bromocresol Green Phenolphthalein (Photo 17). There were two flammable cabinets with hazardous waste: 101 Waste Cabinet held two ~2L bottles and one small plastic container (Photo 18), 131/132

Waste Cabinet held thirteen ~ 2L glass bottles and two small glass bottles (Photo 19) for a total of 18 hazardous waste containers between both cabinets. Each container in the stockroom was closed, labeled with the words “hazardous waste,” and marked with an indication of the hazards of its contents. The inspectors also reviewed the inventory log for the current academic semester (Start: August 16, 2024 & End: December 12, 2024). According to the inspectors’ observations and the inventory log, the Science Laboratory Building was storing approximately 30-gallons of hazardous waste that was accumulated over the course of this semester.

The inspectors also observed a teaching laboratory where hazardous waste is generated in the lab and then stored in fume hoods until transfer to the Chemistry Stockroom, typically once the container is full. The University considers the hazardous waste in fume hoods part of the Chemistry Stockroom Satellite Accumulation Area. The inspectors observed nine small hazardous waste containers (~ 1L or less, both glass and plastic containers) in the fume hoods containing hazardous waste such as Sodium Bicarbonate, Hydrochloric Acid, and Acetone. All nine containers were labeled with the words “Hazardous Waste” however none of the waste containers were marked with an indication of the hazard of its contents (Photo 20 and 21).

Pursuant to ADEM Admin. Code r. 335-14-3-.01(5)(ii) [40 C.F.R. § 262.15(a)(5)(ii)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers with an indication of the hazards of the contents.

Grounds/Transportation Maintenance Area SAA

Since the date of the last CEI, there has been a change in hazardous waste management related to the Grounds/Landscaping SAA (hereafter referred to as the Grounds SAA). The Grounds SAA was previously located in its own building on campus. The building has since been gutted and the Grounds SAA was relocated and merged with the Transportation Department SAA. The Grounds SAA typically manages used aerosol cans and contents of punctured aerosol cans. The Transportation SAA typically manages hazardous waste paint related material that is generated by puncturing aerosol cans as well as used oil and oil contaminated materials. The new combined Grounds/Transportation building also stores used lead acid batteries for recycling in this area, inspectors observed approximately 22 used batteries at the time of the inspection.

Inside the Grounds/Transportation SAA the inspectors observed one closed, 55-gallon drum described as waste paint by facility personnel, labeled with the words “hazardous waste,” an indication of the hazard (flammable indicator), and an accumulation start date of December 6, 2023 (Photo 22). The container was not full at the time of the inspection; facility personnel stated the date on the container reflects the start of accumulation instead of the date the container became full

The inspectors also observed several Used Oil containers: one 200-gallon tank containing used oil (Photo 23), one 5-gallon bucket containing oil contaminated materials (Photo 24), and one container used to transfer used oil, approximately 20-30 gallons, with attached funnel (Photo 25). All containers were labeled with the words used oil. Containers were in good condition and no leaks or spills on the floor were observed at the time of the inspection. There was one open used oil container; the valve on the funnel of the transfer container was in the open position (which also had no lid) and there was oil residue in the funnel (Photo 26).

Pursuant to ADEM Admin. Code r. 335-14-17-.03 (4)(a)(1), a container holding used oil must always be closed during storage, except when it is necessary to add or remove used oil.

Maintenance Division Universal Waste Storage:

The USA manages universal waste in a caged area within the Maintenance Division. Immediately in front of the caged area, the inspectors observed a pallet of approximately 40 cardboard containers for accumulating waste lamps (4-foot and 2-foot boxes) (Photo 27). Seven cardboard containers on this pallet were affixed with blank universal waste labels (there was no accumulation start date and did not contain the phrase “Universal Waste—Lamp(s),” or “Waste Lamp(s),” or “Used Lamp(s)” (Photo 28).

Pursuant to ADEM Admin. Code r. 335-14-11-.03(5)(e) [40 C.F.R. § 273.34(e)], a LQHUW 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.”

In the caged UW area, approximately 75 containers (of varying size) of used waste lamps were observed (Photo 29). A majority were closed, in good condition, and an accumulation start date. Each container was affixed with a universal waste label but at least two labels indicated the contents with the phrase “used bulbs” or “bad bulbs” (Photo 35).

Pursuant to ADEM Admin. Code r. 335-14-11-.03(5)(e) [40 C.F.R. § 273.34(e)], a LQHUW 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.”

The inspectors observed one 2-foot cardboard cylinder containing universal waste lamps that was marked with a universal waste label and accumulation start date but was damaged and not structurally sound; the container was held together by duct tape (Photo 30). In addition, the inspectors observed at least 6 open containers: two 4-foot containers of lamps, one 8-foot container of lamps, and three medium sized cardboard boxes (~3 cu/ft) of lamps (Photo 31, 32, and 33). Facility personnel partially closed 2 of the boxes by folding the box flaps together during the inspection, no tape was used (the open top of the remaining container, the 8-foot box of lamps, was out-of-reach).

Pursuant to ADEM Admin. Code r. 335-14-11-.03(4)(d)(1) [40 CFR 273.33(d)(1)], a LQHUW 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.

In the caged area, the inspectors also observed 5 containers of universal waste batteries: one container of lead acid batteries, one container of lithium batteries, one of NiCad batteries, one of alkaline batteries, and one of assorted batteries. All containers were labeled with a universal waste label and containers were in good condition.

Facility personnel explained that if dates are not written on the label, they track accumulation dates in the UW maintenance area based on the date of the last universal waste shipment event where they typically ship off everything in the storage area. According to records

provided by the university, the last shipment event was on August 14, 2024, which included 22 containers of 4-foot universal waste fluorescent lamps. According to their system all containers in the UW storage area should have an accumulation start date after August 14, 2024. However, inspectors did observe one 30-gallon container of universal waste lithium batteries labeled with an accumulation start date of November 27, 2023 (Photo 34).

12) Records Review

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 April 2024. The plan describes actions facility personnel must take to prevent or respond 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; it describes arrangements agreed to with the local police department, fire department, and local hospital; and it includes the name and telephone number of the individual identified as the emergency coordinator, and of the individuals identified as alternate emergency coordinators. The plan includes a list of emergency equipment and the location of that equipment at the facility, and that list includes fire extinguishing systems, spill control equipment, communications and alarm systems, and decontamination equipment. Finally, the contingency plan does not include an evacuation plan.

Pursuant to ADEM Admin. Code r. 335-14-5-.04(3)(f) [40 CFR 262.261(f)], The plan must include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary. This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes (in cases where the primary routes could be blocked by releases of hazardous waste or fires). All evacuation routes should be depicted on a map to be included with the evacuation plan.

The facility provided documentation that a copy of the contingency plan was sent to: USA Maintenance Department, Chief of Police, Senior Construction Manager, City of Mobile Fire and Rescue, Mobile County Emergency Management, USA Transportation Services, and the Landscaping Manager. A copy of the contingency plan was not submitted to local hospitals. On December 2, 2024, the facility provided inspectors, via email, with a Letter of Acknowledgement from the USA University Hospital that a copy of the University's Contingency Plan was received on November 26, 2024.

The USA also has a quick reference guide (QRG) last updated April 2021, which identifies the name of the emergency coordinator(s) and emergency telephone number(s), the hazardous waste SAAs and the type and volume of hazardous waste in each area, locations of universal waste and used oil, and a list of on-site notification systems. Maps included are University of South Alabama topographic map, location of water supply (fire hydrants and flow rates), school

location map with list, land usage map, hydrology map, MS-4 location maps, USA-TSD Building Plans, and map of solid waste management unit locations and areas of concern.

The QRG, dated April 2021, has not been updated to reflect the combination of the Grounds and Transportation department SAAs which occurred in 2024.

Pursuant to ADEM Admin Code r. 335-14-3-.14(10)(c) [40 CFR 262.262(c)], generators must update, if necessary, their quick reference guides, whenever the contingency plan is amended and submit these documents to the local emergency responders identified at 335-14-3-.14(10)(a) or, as appropriate, the Local Emergency Planning Committee.

The University had a copy of the QRG on site but did not provide documentation that it was sent to local authorities. Anne Foster and William Guess confirmed at the time of the inspection that copies of the QRG have not been sent to local authorities.

Pursuant to ADEM Admin. Code r. 335-14-3-.14(10)(b) [40 CFR 262.262(b)], a large quantity generator that first becomes subject to these provisions after May 30, 2017 or a large quantity generator that is otherwise amending its contingency plan must at that time 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.

Training Records:

Facility job descriptions, employee names, and training records for the Assistant Director of Safety and Environmental Compliance, the Director of Safety and Environmental Compliance, an Industrial Hygiene Specialist, Lab Specialist, Emergency Management and Life Safety Specialist, Fire Marshal, Training Specialist, and Safety Specialist I were provided. The job descriptions included the requisite skill, education, or other qualifications, and duties of facility personnel assigned to that position.

The University provided a training course name, location, and date of both introductory and continuing training given to each person filling the positions listed above. The inspectors reviewed records of employee hazardous waste training completed in 2021, 2022, 2023, and 2024. Some training has been completed in 2024, for example, the Hazardous Materials 8-hour Refresher Course has been completed for all 8 employees. Additional training such as contingency plans, emergency response, and lab safety and chemical waste management has not yet been completed for 2024 but according to records and statements given by Anne Foster and William Guess during the inspection, these trainings are typically conducted in December.

Waste Manifest Records:

The inspectors reviewed a random sample of inbound and outbound hazardous waste manifest records since the date of the last CEI. Waste manifest records indicate waste with federal waste codes D001, F003, and F005 are most routinely shipped out to several different facilities, with Tradebe Treatment & Recycling of TN (TND000772186) being the most routinely used designated facility. The most recent shipment of hazardous waste was made on July 25, 2024.

Though the facility provided “Certificate of Destruction” records received from the designated TSDF, at the time of the inspection, the facility’s records did not include signed return copies of the seven outbound hazardous waste manifests listed in Table 1.

Table 1: Manifests in USA’s records missing a copy with the handwritten signature of the owner or operator of the designated facility.

Manifest Number	Waste Codes	Waste Destination	Date of Shipment/ Receipt
001340609WAS	D001/D002/ D011	Heritage - Environmental Services LLC-IND093219012	5/24/2024 6/19/2024
001340610WAS	D001/ D002/ D018/F003	Rineco Chemical Industries, LLC-ARD981057870	5/24/2024 6/4/2024
001340611WAS	D001	Heritage - Environmental Svc LLC- MOD981505555	5/24/2024 6/21/2024
001340612WAS	D001	Heritage Thermal Services, Inc- OHD980613541	5/24/2024 7/20/2024
001340614WAS	D001/F003/ U117	Heritage Thermal Services, Inc- OHD980613541	5/24/2024 7/20/2024
001340615WAS	D001/D011	Heritage Thermal Services, Inc- OHD980613541	5/24/2024 7/20/2024
001340858WAS	D002/D009	Heritage - Environmental Services LLC-IND093219012	7/23/2023 8/4/2024

The University stated they were in communication with the TSDF and had requested the manifests, but they had still not received them by the time of the inspection. EPA inspectors Alexis Wilson and Laurie Benton DiGaetano accompanied Anne Foster to her office to search the e-Manifest system for the signed manifest copies. At that time, Anne Foster stated that neither she or William Guess have e-Manifest accounts and therefore cannot access any manifest copies that may be uploaded to the system. On December 2, 2024, the facility provided the signed “designated facility to EPA’s e-manifest system” copies of the seven manifests listed in Table 1. The records show that 2 manifests (001340612WAS and 001340614WAS) were signed by the designated facility on July 19, 2024, 56 days after the

generator and transporter signed the manifest on May 24, 2024. The University did not submit exception reports after 45 days of not receiving signed copies of the manifests.

Pursuant to ADEM Admin. Code r. 335-14-3-.04(3)(a)(2) [40 C.F.R. 262.42(a)(2)], an LQG must submit an Exception Report if he has not received a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 45 days of the date the waste was accepted by the initial transporter.

The inbound manifest records were dated and complete with all generator, transporter, and designated facility signatures. However, the top copies (page 1) of the paper manifest of received hazardous waste shipments have not been uploaded to the e-Manifest system between June 30, 2021, till the date of the inspection on November 19, 2024.

Pursuant to Hazardous Waste Facility Permit No. ALD079474037, Permit Condition II.O, the Permittee shall comply with the requirements of ADEM Admin. Code r. 335-14-5-.05(2), (3), and (7) [40 CFR 264.71(a)(2)]. Specifically, ADEM Admin. Code r. 335-14-5-.05(2)(a)(2)(v)(II) [40 C.F.R. § 264.71(a)(2)(v)(B)], requires the owner or operator of a facility that receives a hazardous waste manifest shipment accompanied by a manifest to send the top copy (Page 1) of the paper manifest and any paper continuation sheet to the e-Manifest system for purposes of data entry and processing. Beginning June 30, 2021, this requirement may be met by the owner or operator only by transmitting to the EPA system an image file of Page 1 of the manifest and any continuation sheet, or by transmitting to the EPA system both a data file and the image file corresponding to Page 1 of the manifest and any continuation sheet, within 30 days of the date of delivery. Submissions of copies to the e-Manifest system shall be made to the electronic mail/submission address specified at the e-Manifest program website's directory of services.

Weekly Inspection Records:

The inspectors reviewed the University's available records of weekly inspections of the hazardous waste containers in the TSD building since the date of the last CEI. The inspection log includes the date and time of the inspection, the name of the person conducting the inspection, and observations and/or issues. The inspection log includes daily and weekly checklists to record observations including but not limited to leaks (neutralization tank, containers), cracks in walls and floors, emergency equipment, communication equipment, and personal protective equipment. Immediately following treatment, treated waste is released from the neutralization tank through the USA sanitary sewer system and ultimately to the City of Mobile's sanitary sewer system. The tank is not used to store hazardous waste. However, inspections of the neutralization tank are included on the weekly inspection checklist.

13) Closing Conference

The inspectors conducted the exit meeting at approximately 6:30pm with William Guess and Anne Foster. During this meeting, the inspectors stated their preliminary conclusions of the inspection. The inspectors requested digital copies of select Manifest records, the Contingency Plan and QRG, and records on specific hazardous waste containers and universal waste

containers (accumulation dates, point of generation, etc.) due by December 3, 2024, which the University agreed to provide.

On November 27, 2024, William Guess provided the records in an email to Alexis Wilson, Laurie Benton DiGaetano, Brooke York, Devon Robinson, and Lee Gunter, however the files were inaccessible due to the file management system used by the University. On December 2, 2024, Alexis Wilson, sent an email to William Guess requesting the files be re-sent using an accessible file management system. William Guess sent the files on December 2nd, and they were successfully received by the inspectors.

14) List of Attachments

Attachment 1 – Photo Log

15) Signed

ALEXIS WILSON Digitally signed by ALEXIS WILSON
Date: 2025.01.29 13:51:57 -05'00'

Alexis Wilson
Physical Scientist

16) Concurrence

ALAN NEWMAN Digitally signed by ALAN NEWMAN
Date: 2025.01.29 13:53:17 -05'00'

for Brooke York, Acting Chief
RCRA Enforcement Section

Attachment 1 – Photo Log

35 Photos taken on: November 19, 2024

Photos taken by: Alexis Wilson

Photos taken with: Canon PowerShot G7X

EPA Property Tag: SX8073



Photo 1: 30-gallon drum of hazardous waste labeled Carson's Solution in the TSD Building outdoor staging area.



Photo 2: Hazardous waste label on the 30-gallon drum of hazardous waste labeled Carson's Solution in the TSD Building outdoor staging area



Photo 3: Twelve 55-gallon hazardous waste drums in the processing area of the TSD building.

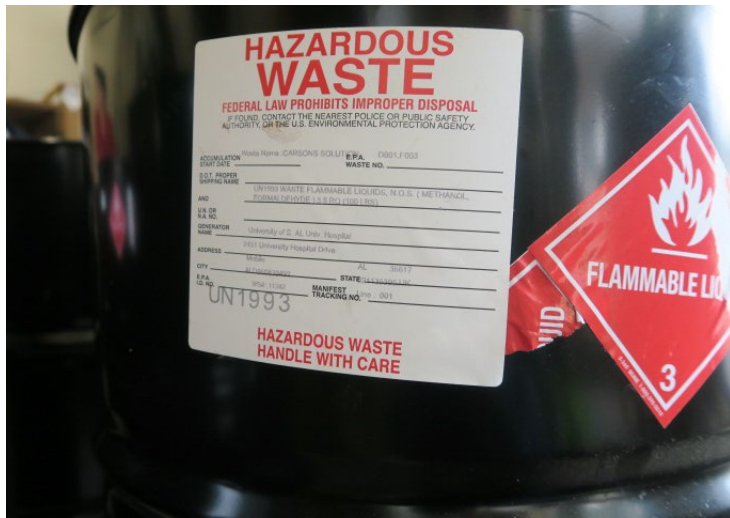


Photo 4: Hazardous waste label on one of the twelve 55-gallon drums in the processing area of the TSD building. The label has the waste codes D001 and F003 and the words “hazardous waste’. The label does not include an accumulation start date. The container has a flammable liquid hazard indicator but does not have a Toxic hazard indicator label.



Photo 5: Neutralization tank in the TSD building.



Photo 6: Seven containers of universal waste batteries in the TSD building.



Photo 7: Four 30-gallon drums of hazardous waste in the TSD building, to the right of the entrance.



Photo 8: Five containers (four 55-gallon and one 30-gallon drum) on a catch basin in the TSD building. The 30-gallon drum and 55-gallon drum with the hose attachment contained hazardous waste (Carson's solution). The other containers were empty, contained non-hazardous waste, and non-regulated material.



Photo 9: Waste containers on the wooden shelves at the incoming waste processing area in the TSD Building, shelf labeled with flammable liquid hazard indicator, for flammable waste storage.



Photo 10: Waste containers on the wooden shelves at the incoming waste processing area in the TSD Building, shelf labeled with Toxic hazard indicator for miscellaneous toxic waste storage.



Photo 11: Waste containers on the wooden shelves in the TSD Building, shelf labeled with corrosive hazard indicator for acid waste storage.



Photo 12: Waste containers on the wooden shelves in the TSD Building, shelf labeled with poison hazard indicator.



Photo 13: Waste containers on the wooden shelves in the TSD Building, shelf labeled with flammable hazard indicator.



Photo 14: Waste containers on the wooden shelves in the TSD Building, shelf labeled with poison hazard indicator, for toxic solids or liquids.



Photo 15: One 30-gallon hazardous waste drum labeled with the words "hazardous waste," corrosive hazard indicator, waste codes, and accumulation start date. Located next to the wooden shelf for toxic waste (reference Photo 14).



Photo 16: one 30-gallon drum containing lead vests, that was labeled with waste code D008, an accumulation start date, and a hazardous waste label. The container did not have an indication of hazard label. Located next to the wooden shelf for toxic waste (reference photo 10).



Photo 17: Mobile cart holding six 5-gallon carboy containers of hazardous waste in the Chemical Stockroom SAA located in the Science Laboratory Building.



Photo 18: Three containers of hazardous waste in the flammable waste cabinet (labeled 101) in the Chemical Stockroom SAA located in the Science Laboratory Building.



Photo 19: 15 containers of hazardous waste in the flammable waste cabinet (labeled 131/132) in the Chemical Stockroom SAA located in the Science Laboratory Building.



Photo 20: Hazardous waste containers in the fume hood of a chemistry lab in the Science laboratory building SAA. Containers were labeled with the words hazardous waste but did not contain indications of hazard.



Photo 21: Hazardous waste containers in the fume hood of a chemistry lab in the Science laboratory building SAA. Containers were labeled with the words hazardous waste but did not contain indications of hazard.



Photo 22: One 55-gallon drum containing hazardous waste (paint waste), with an indication of hazard (flammable), the words "hazardous waste," and an accumulation start date. Located in the Grounds/Transportation Maintenance Area SAA.



Photo 23: 200-gallon tank in the Grounds/Transportation building labeled "used oil". Located in the Grounds/Transportation Maintenance Area.



Photo 24: one 5-gallon bucket of used oil contaminated materials labeled "used oil", in the Grounds/Transportation Maintenance Area.



Photo 25: Container used to transfer used oil with funnel attached (valve in the open position), labeled used oil. Located in the Grounds/Transportation Maintenance Area.



Photo 26: Oil residue in the funnel of the container used to transfer used oil. Located in the Grounds/Transportation Maintenance Area.

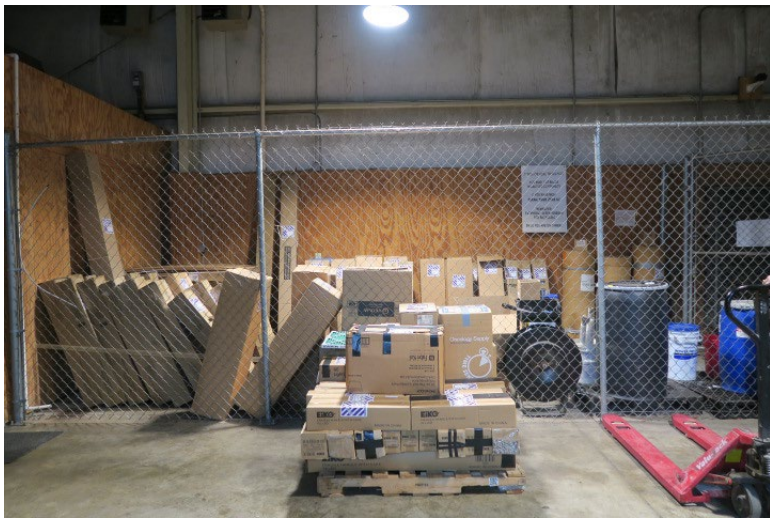


Photo 27: A pallet holding approximately 40 cardboard containers of universal waste lamps and batteries located in the Maintenance Division building. Also pictured, universal waste lamps and batteries inside a caged area.



Photo 28: Three cardboard containers with blank universal waste labels on the pallet in front of the caged universal waste area in the Maintenance Division.



Photo 29: Approximately 75 containers of universal waste lamps and batteries in the caged universal waste area in the Maintenance Division.



Photo 30: 2-foot cardboard cylinder wrapped in orange and silver duct tape containing universal waste lamps that was marked with a universal waste label and accumulation start date but was damaged and not structurally sound. Located in the caged universal waste area of the Maintenance Division.



Photo 31: One open 4-foot container of waste lamps in the caged universal waste area of the Maintenance Division. *The flaps were closed by facility personnel during the inspection as pictured here, but not secured with tape. Reference Photo 27 shows this container open before the flaps were closed (see 4th box from the right along the back wall).



Photo 32: One open 8-foot container of waste lamps in the caged universal waste area of the Maintenance Division.



Photo 33: Three open cardboard boxes of waste lamps, flaps were folded together by facility personnel but are not secured with tape. Located in the in the caged universal waste area of the Maintenance Division.



Photo 34: one 30-gallon drum of universal waste lithium batteries with an accumulation start date of 11/27/23, located in the caged universal waste area of the Maintenance Division.



Photo 35: Container of universal waste identifying contents with the phrase "bad bulbs" and "used bulbs", located in the caged universal waste area of the Maintenance Division.