



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 1
5 Post Office Square, Suite 100
Boston, MA 02109-3912

URGENT MATTER - EARLY WARNING NOTICE

November 19, 2024

Meaghan Healey, Associate Vice President of Facilities Operations
Northeastern University
360 Huntington, Avenue
Boston, MA 02115

RE: **NOTICE OF POTENTIAL VIOLATION** of the Resource Conservation and Recovery Act (RCRA), the Hazardous and Solid Waste Amendments of 1984 (HSWA) and Massachusetts General Law, Chapter 21C, Sections 4 and 6. The State of Massachusetts has been granted final authorization by EPA to administer certain portions of RCRA.

Dear Ms. Healey:

On August 20-23, 2024, representatives of the United States Environmental Protection Agency ("EPA") conducted a RCRA Compliance Evaluation Inspection. The purpose of this inspection was, in part, to determine the compliance of Northeastern University, EPA ID # MAD001423631, with the relevant hazardous waste management regulations for the State of Massachusetts and the corresponding federal Hazardous Waste Management Regulations found at 40 C.F.R. Parts 260-273.

As a follow up to the detailed out-brief provided by EPA at the conclusion of the compliance evaluation inspection of your facility, a partial written list of deficiencies is provided below to summarize the potential violations/areas of concern identified. Additional potential violations or areas of concern determined subsequent to EPA's inspection may also be included in the list below. You are requested to take immediate action on your part to evaluate this listing below and take corrective measures where necessary.

Potential Violations/Areas of Concern:

1. Failure to obtain a permit to store hazardous waste for longer than 90 days

2. Failure to inspect hazardous waste containers on a weekly basis
3. Failure to maintain an impervious surface at hazardous waste storage areas
4. Failure to make adequate waste determinations
5. Failure to separate possible incompatible materials
6. Failure to maintain closed containers while waste was not being added or removed
7. Failure to appropriately date containers of hazardous waste
8. Failure to appropriately label containers of hazardous waste
9. Failure to move a full satellite container of hazardous waste to a centralized accumulation area within three days after the date of accumulation.
10. Failure to maintain containers holding hazardous waste in good condition
11. Failure to maintain adequate aisle space between hazardous waste containers
12. Failure to conduct hazardous waste training
13. Failure to comply with universal waste requirements

This letter is EPA's initial response to potential hazardous waste violations and areas of concern that were observed during our August 20-23, 2024 inspection of your facility. The primary purpose of this letter is to identify potential problem areas and seek compliance. This Notice does not limit or otherwise preclude EPA from taking civil or criminal enforcement action pursuant to Section 3008 of RCRA, 42 U.S.C. § 6928 with regard to these or other violations that may be determined. EPA is continuing to investigate and evaluate Northeastern University's compliance under RCRA and may take an enforcement action as appropriate.

I urge you to take immediate positive steps to remedy the above-cited potential violations/areas of concern. If you have any questions regarding this letter or how to comply with RCRA requirements, please contact Cheryl Wilkinson of my staff at (617) 918-1760 or wilkinson.cheryl@epa.gov.

Sincerely,

O'Donnell, Mary
Jane

Digitally signed by O'Donnell,
Mary Jane
Date: 2024.11.19 16:36:23 -05'00'

Mary Jane O'Donnell, Chief
Waste and Chemical Compliance Section

cc: Scott Fasulo, MassDEP