

EPA Region 10 Enforcement Division

INSPECTION REPORT

Inspection Entry Date/Time	10/18/2022 08:07 AM (PT)	Announced: No
Inspection Exit Date/Time	10/19/2022 01:00 PM (PT)	Access: Granted
Weather	Day 1 – Cloudy and gray, Day 2 – Cloudy and gray	
Regulatory Program	RCRA	
Type of Inspection	CEI - Compliance Evaluation Inspection	
Company Name	Western Washington University (WWU)	
Facility or Site Name	WWU Main Campus	
Facility/Site Identifier	WAD079253134	
Facility/Site Physical Address	516 High St	
City, State, Zip Code	Bellingham, WA 98225	
County/Borough	Whatcom	
Generator Status	Large Quantity Generator (LQG)	
NAICS	611310 – Colleges, Universities, and Professional Schools	
Type of Operation	University	
Size of Facility	215 acres	
Length of Facility at Location	Since 1893	
Geographic Coordinates	48.732531, -122.487559	
Mailing Address/Secondary Address	Grant Whitman, MPH whitmag2@wwu.edu Laboratory Safety Consultant, Interim Hazardous Waste Contact Environmental Health and Safety Western Washington University CS132A, MS 9070 2001 Bill McDonald Parkway, Bellingham, WA 98225 (360) 650-4064	
City, State, Zip Code	Bellingham, WA 98225	
Permit Number (If Applicable)	Not Applicable	
Lead Inspector:		
Jon Jones		
	EPA Region 10	Jones.Jon@epa.gov (907) 271-6329
Supervisor Review:		
Jen Sullivan		
	EPA Region 10	Sullivan.Jennifer.A@epa.gov (206) 553-6978

SECTION I – INTRODUCTION

Site Entry and Purpose of the Inspection

Type of inspection: CEI - Compliance Evaluation Inspection

Inspection Date(s): October 18-19, 2022

This report is based on information supplied by WWU Main Campus Facility representatives, observations made by the EPA Region 10 inspector, and records and reports maintained by the facility and its HQ including, but not limited to: direct observations made by the EPA Region 10 Inspector(s), photographs taken by EPA Region 10 inspector(s), physical evidence collected by the EPA Region 10 inspector(s), measurements or samples taken by EPA Region 10 inspector(s), verbal or written statements made by information supplied by the facility representatives during or subsequent to the on-site Inspection, and materials, processes, data, photographs, or documents shown, demonstrated, or submitted to the EPA Region 10 inspector(s) by the facility representatives during or subsequent to the on-site Inspection. In addition, information gathered, prior and/or subsequent to the Inspection, from a review of USEPA, State, and public records, may be included in this report.

Attendees

Title/Organization	Name	Phone	Email	Opening Conf.	Closing Conf.
Lead Inspector/EPA Region 10	Jon Jones	9072716329	Jones.Jon@epa.gov	Yes	Yes
Hazardous Waste Manager/WWU	Gary Carlton	(360) 650-6527	carltog@wwu.edu	Yes	Yes
Laboratory Safety Consultant, Interim Hazardous Waste Contact/WWU	Grant Whitman	(360) 650-4064	whitmag2@wwu.edu	Yes	No
Inspector/Ecology	Chris Teske	(360) 255-4384	ctes461@ecy.wa.gov	Yes	Yes

Opening Conference

EPA Region 10 Lead Inspector, Jon Jones, arrived at the WWU Main Campus Facility (the "Site," "WWU," or "Facility"), located at 516 High St, Bellingham, WA 98225, at 08:07 AM (PT) on 10/18/2022 for an unannounced inspection. EPA Region 10 Lead Inspector presented credentials to and informed Gary Carlton that this was an EPA Region 10 inspection to determine compliance with Resource Conservation and Recovery Act (RCRA). The table above presents all the inspection participants in opening and closing conferences.

Facility/Site Information

Number of employees	Unknown - Mr. Carlton unsure about the number of employees. Approximately 2,000 as per 10/24/19 Ecology inspection.
Weather Conditions	Cloudy and gray
Operating Hours	Monday through Friday from 8:00 a.m. to 5:00 p.m.
Safety Training Provided to Inspector(s)?	No
What type of generator facility notified?	Large Quantity Generator (LQG) of hazardous waste and Small Quantity Handler of universal waste.
What type of generator facility verified as?	Verified LQG by Mr. Carlton

Process Description

During the opening conference, Mr. Carlton provided the following information:

- The former central accumulation area (CAA) in the Chemistry Building was moved to the new Interdisciplinary Science Building (ISB).
- ISB CAA started operating at the beginning of June 2022.
- Chemistry Building CAA was converted to a universal waste battery storage area.
- All other previous CAAs are now satellite accumulation areas (SAAs).
- Informed us that he would be retiring on 12/23/22.
- WWUs Shannon Point facility (WAD988483061) in Anacortes, WA. is a Very Small Quantity Generator (VSQG) and waste is picked up by Mr. Carlton twice a year and brought to the main campus ISB CAA.
- Universal waste lamps and batteries generated on the main campus are taken to WWUs off-site Physical Plant (WAD981763030) which is also a VSQG.

Mr. Carlton told us that wastes were generated in the following Departments/Locations on campus:

- Chemistry - Various chemical wastes.
- Biology - Various wastes, including waste formalin and wastes related to the use of ethidium bromide. Waste aerosols generated on the main campus are brought to the biology building where they are punctured.
- Engineering Technology - Waste resin and solvents, used oil and waste fuels.
- Fine Arts - Waste glazes, paints, and solvents. The photography classroom has a silver recovery system, and the silver is recycled through Hallmark Refining Corp.
- Psychology - Various chemical/lab wastes.
- College of Environmental Studies - Various chemical/lab wastes.
- Interdisciplinary Science Building (CAA)
- Campus Services - Miscellaneous evidentiary waste generated by the Campus Police.
- Health Services - Medical wastes, universal waste batteries, and waste pharmaceuticals.

Building(s)

Building/Area/Sub-area	Process Description	Area of Concern
Art Annex		Yes
Room 51 Glaze Room	Ceramics - SAA	Yes
Biology		Yes
Room 131A	Waste aerosol can pop room - SAA	Yes
Room 246 Biology stockroom	Fume hood - SAA	Yes
Room 363 Zoology prep room - Research lab	Fume hood - SAA	No
Room 364 Pillitteri Research Lab	Fume hood - SAA	Yes
Room 436 Research Lab	Fume hood - SAA	Yes
Room 437 Research Lab	Fume hood - SAA	No
Room 440 Research Lab	Fume hood - SAA	No
Campus Services		No
Chemistry		Yes
Room 141	Accumulation of universal waste batteries and hazardous waste CAA	Yes

Room 150 Chemical stockroom	Chemical storage	Yes
Room 252 Research Lab	Fume hood - SAA	Yes
Room 330A Prep room	Fume hood - SAA	No
Room 370 Research Lab	Fume hood - SAA	Yes
Room 410 Research Lab	Fume hood - SAA	Yes
Room 412 Research Lab	Fume hood - SAA	Yes
Room 470 Research Lab	Fume hood - SAA	Yes
Room 480 Isotope Lab	Fume hood - SAA	Yes
College of Environmental Studies		Yes
Room 404 Research Lab	Env. Nano Geochem lab. - Fume hood - SAA	No
Room 405 Research Lab	Shared research space - Fume hood - SAA	No
Room 503 Research Lab	Institute for watershed studies lab - Fume hood - SAA	Yes
Room 505 Research Lab	Scientific Technical Services lab - Fume hood - SAA	No
Engineering Technology		Yes
Polymer Materials Engineering (PME) paint booth	SAA	Yes
Flammable cabinet	Mixed solvent waste SAA.	Yes
Waste shed	Waste CAA	Yes
Fine Arts		Yes
Room 202	Photography.	No
Room 214	Printmaking.	No
Room FI240	Paint studio and waste SAA.	Yes
Health Services		Yes
Health Clinic Storeroom	Storage of medical supplies and accumulation area for waste pharmaceuticals and waste batteries.	Yes
Interdisciplinary Science Building (ISB)		Yes
Room 119 Chemical Waste	Central Accumulation Area (CAA)	Yes
Acid corrosive area		Yes
Halogenated flammable neutral area		Yes
Non-halogenated flammable neutral area		Yes
Walk-in fume hood	Storage of 55-gallon containers.	Yes
Toxic Area	Storage area for toxic wastes.	Yes
Psychology - Academic Instructional East		Yes
Room 532 Research Lab	Fume hood - SAA	Yes
Room 542 Research Lab	Fume hood - SAA	Yes
Room 552 Research Lab	Fume hood - SAA	No
Room 563 Research Lab	Histology fume hood - SAA	No

SECTION II – OBSERVATIONS

Building: Health Services/Health Clinic/Health Clinic Storeroom			
Observation #: JJ1-OB-001	Date: 10/18/2022	Contains AOC: Yes	Contains CBI: No
Person Interviewed: Denise Song		Title: Registered Nurse	
While inspecting the WWU Health Clinic, we met with Ms. June Thistle, Office Manager, Ms. Denise Song, Registered Nurse (RN), and Ms. Lea Terbeek, RN, Nurse Manager. Nurse Song took us into the stockroom to show us where the clinic accumulates waste. While in the stockroom, we saw a red container that was labeled with the words "Chemical Waste Disposal." At the time of the inspection, the container was not closed and held four smaller containers that were labeled as containing "10% Neutral Buffered Formalin." According to clinic personnel, the waste was pathology waste and a State of Washington only, toxic waste. It was also noted that the container was also not labeled with the words "Hazardous Waste" or "Dangerous Waste" and was not marked with a hazard risk/indicator label. Adjacent to the "Chemical Waste Disposal" container, we saw another red container that held a mix of waste batteries. At the time of the inspection, the container was not labeled with either the words "Universal Waste - Batteries," "Waste Batteries," or "Used Batteries." There was also no date on the container to indicate when the first waste battery was placed inside of the container and no other demonstration as to the length of time the batteries had been accumulated. The container held mostly waste alkaline batteries however, at least one waste nickel-cadmium battery was observed inside the container. We also saw a black, 15-gallon container that held pharmaceutical waste. At the time of the inspection, the container was labeled with the words "Hazardous Waste Pharmaceuticals" however, there was no marking or labeling with the date the hazardous waste pharmaceuticals (HWPharms) first became a waste. After speaking with clinic personnel regarding the accumulation time of HWPharms it didn't seem as though the clinic was maintaining an inventory system. We also saw a 5-gallon satellite accumulation area (SAA) container of waste asthma inhalers. At the time of the inspection, the container was labeled with the words "Hazardous Waste." The container was not marked or labeled with a hazard risk/indicator. We also saw a quart sized SAA container of waste Epi pens. At the time of the inspection, the container was labeled with the words "Hazardous Waste." The container was not marked or labeled with a hazard risk/indicator. We also saw a 5-gallon SAA container that held waste ammonia inhalers. At the time of the inspection, the container was labeled with the words "Hazardous Waste." The container was not marked or labeled with a hazard risk/indicator. During the inspection of the clinic, I requested the safety data sheet (SDS) for the ammonia inhalers. While inspecting the clinic, I asked for copies of disposal paperwork for their HWPharms. Ms. Thistle provided the paperwork to me via an email that she sent to me on the day of the inspection. The inspection of that disposal paperwork is addressed in the records review portion of this inspection report. The paperwork submitted by Ms. Thistle is included in the document log that accompanies this inspection report.			

Photo(s)

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Building: Chemistry/Room 141/Universal Waste/Hazardous Waste accumulation area

Observation #: JJ1-OB-002

Date: 10/18/2022

Contains AOC: Yes

Contains CBI: No

Person Interviewed: Calvin Murphy

Title: Chemistry Department Safety Coordinator

We went to the Chemistry building and after arriving we were introduced to Mr. Calvin Murphy, Chemistry Department Safety Coordinator. Mr. Murphy accompanied us throughout the inspection of the Chemistry building. Mr. Carlton said that the Chemistry building was also known as Morse Hall. We started the inspection of the Chemistry building in Room 141.

According to Messrs. Carlton and Murphy, Room 141 was a waste battery accumulation area. After entering room 141, we saw three cardboard box containers of waste batteries on top of a desk. One of the boxes held waste "Button" type batteries. The box held both loose waste "Button" type batteries and a plastic bag that held additional waste "Button" type batteries. At the time of the inspection, the box was labeled with the words "Universal Waste - Batteries" and was dated 12/12/2020. According to Mr. Carlton, the date on the container was an old date that had been previously placed on the box and that the batteries were no older than eight months. The plastic bag inside the box was marked with the date, 3/16/22.

The second box of waste batteries held at least one waste lithium battery and one waste nickel-cadmium battery. At the time of the inspection, this second box of waste batteries was not labeled as either "Universal Waste - Batteries," "Waste Batteries," or "Used Batteries." The box was also not dated with the date the waste batteries first became a waste.

The third box contained a few alkaline batteries and a plastic container that held at least one waste nickel-cadmium battery and one waste nickel-metal hydride battery. The third waste battery container was not labeled as either "Universal Waste - Batteries," "Waste Batteries," or "Used Batteries." The box was also not dated with the date the waste batteries first became a waste.

While in this same area, we saw a plastic tub on the floor beneath the desk. The tub held approximately seven batteries that looked like either waste nickel-cadmium or waste lithium batteries. The tub was not labeled as either "Universal Waste - Batteries," "Waste Batteries," or "Used Batteries." The tub was also not dated with the date the waste batteries first became a waste.

While still in Room 141, we saw two, yellow flammable storage cabinets stacked one on top of the other. The top cabinet was marked with the words "Flammable Neutral" and the number 2. I opened the top flammable storage cabinet and saw that it contained a clear plastic tub that held what looked like two old waste chemicals. The smaller of the two was labeled with the words "Not permitted to transport," "Toxic & flammable," and dated "7/94" and "6/19." The original labeling on the container indicated that it held 1-Methyl-3-nitro-1-nitrosoguanidine." According to Mr. Carlton, the "7/94" date was likely when the chemical was received and "6/19" was likely the date when they started tracking to dispose after one year. According to this information, the accumulation start date would have been June of 2020. The waste has been in accumulation for greater than 90-days. Based on the date, the actual accumulation time would be 840 days. The container was also not labeled with the words "Hazardous Waste."

The larger of the two, was a blue, one-quart sized metal container with a metal lid. The container appeared to be a compressed gas cylinder. According to the labeling on the container, it held "Iron penta carbonyl - 99.5%." Additional markings indicated that the contents were both flammable and toxic. The container was also dated "6/18." According to Mr. Carlton, the bottle had been sitting in a fridge for 18 years. The labeling on the bottle says to "Store Cold." At the time of the inspection, the bottle was not being stored cold. According to this information, the waste had been in accumulation for greater than 90-days. Based on the date, the actual accumulation time would be 1,205 days. The container was also not labeled with the words "Hazardous Waste."

According to Mr. Carlton, the university's waste vendor, Clean Harbors, would not ship either waste and he said he got no explanation as to why they wouldn't ship them. Mr. Carlton said the last shipment was approximately two months ago. I asked if weekly hazardous waste inspections were being conducted and Mr. Carlton said he believed Room 141 was part of the weekly inspections.

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Building: Chemistry/Room 252/Research lab			
Observation #: JJ1-OB-003	Date: 10/18/2022	Contains AOC: Yes	Contains CBI: No
Person Interviewed: Calvin Murphy		Title: Chemistry Department Safety Coordinator	
While in the room 252 research lab, we looked inside of a fume hood SAA and saw a gray plastic tub that held two, 1-gallon glass containers of waste with attached funnels with lids and a 5-gallon blue poly container of waste. Both glass waste containers were labeled with the words "Hazardous Waste." One of the glass waste containers was labeled as containing waste acid and the other waste basic. Not only were the two incompatible waste containers being accumulated in the same gray plastic tub, but they were both not closed (funnel lids were not clasped down) and the waste acid container was not marked/labeled with a hazard risk/indicator. The 5-gallon blue poly container was only labeled as "O'Neil - 252" and was also not closed. The 5-gallon poly was not labeled with the words "Hazardous/Dangerous Waste" and was not marked/labeled with a hazard risk/indicator. Mr. Carlton stated that it might be a WT02, WA. State only toxic waste. I explained that a waste determination would need to be made. At the time of the inspection, no one was working in this area, actively adding or removing waste. Adjacent to the gray plastic tub, we saw a clear plastic tub that held two, 4-liter glass containers of waste. The two glass containers were labeled with the words "Hazardous Waste" and each was marked as containing flammable/toxic waste. The two, 4-liter waste containers had attached funnels with lids. At the time of the inspection, both of the, 4-liter, waste containers were not closed. The attached funnels had clasps to keep them closed and one was not clasped down and the other was broken and would not be able to close. At the			

time of the inspection, no one was working in this area, actively adding or removing waste.

While inspecting some of the chemical storage cabinets, I saw a type of lab equipment that held what I thought might be waste. It was inside of a rusted metal, cylindrical container and labeled as containing chromium chloride. According to lab personnel, the piece of lab equipment was referred to as a "Schlenk." According to Mr. Carlton, the labs all have what they referred to as a "Principle Investigator" or P.I. The P.I. is tasked with periodically going through chemical inventory to determine if any expire and/or become a waste. We met with the P.I. for the lab, Mr. Gregory O'Neil. Mr. O'Neil explained that the chromium chloride was an air-sensitive chemical and the Schlenk was used with air-sensitive chemicals. He said that the chromium chloride was still green in color and therefore was still good chemical for use.

Photo(s)

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Building: Chemistry/Room 370/Research lab

Observation #: JJ1-OB-004

Date: 10/18/2022

Contains AOC: Yes

Contains CBI: No

Person Interviewed: Calvin Murphy

Title: Chemistry Department Safety Coordinator

While in the Room 370 research lab, we inspected the contents of a fume hood SAA and saw two, 4-liter glass waste containers that were in a plastic tub that was marked G-29. At the time of the inspection, the container in the front of the tub was closed and labeled with the words "Hazardous Waste" but was not marked/labeled with a hazard risk/indicator. The second glass waste container in the back of the plastic tub was labeled with the words "Hazardous Waste" and marked with a hazard risk/indicator however, it had an attached funnel with lid that was not closed. At the time of the inspection, no one was working in this area, actively adding or removing waste.

We also saw another plastic tub in the back of the fume hood SAA and to the right of the tub mentioned above. The plastic tub also held two, 4-liter glass waste containers with attached funnels with lids. At the time of the inspection, the waste container in the tub, on the right, was not closed. The lid on the funnel was not making a complete seal on the funnel. At the time of the inspection, no one was working in this area, actively adding or removing waste.

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6. [IMG_0161.jpg](#)

Building: Chemistry/Room 480/Isotope lab**Observation #:** JJ1-OB-005**Date:** 10/18/2022**Contains AOC:** Yes**Contains CBI:** No**Person Interviewed:** Calvin Murphy**Title:** Chemistry Department Safety Coordinator

While inspecting the Room 480 Isotope lab, we observed waste SAA containers inside of a fume hood. We saw a 1-quart size, gray, poly waste container with a blue lid. There was a piece of masking tape on the bottom of the container that was marked with the words, "GEL WASTE." The container was also marked with a hazardous waste label and a hazard risk/indicator. At the time of the inspection, the lid was on the container, but the container was not closed. The lid was not screwed onto the container. At the time of the inspection, no one was working in this area, actively adding or removing waste.

We saw another waste SAA container inside the fume hood that wasn't closed. We saw a 5-gallon poly carboy that was marked with a hazardous waste label and a hazard risk/indicator, but the container was missing its lid and was not closed. At the time of the inspection, no one was working in this area, actively adding or removing waste. Mr. Carlton closed the 5-gallon poly carboy container during the inspection.

We also saw a smaller container that was labeled as Uranium-238 and dated 11/1/21. I asked Mr. Carlton if it was a waste container and he said he wasn't sure what it was and that he would have to do some checking. He stated that he would follow-up with me on the status of the container and its contents.

Photo(s)

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Building: Chemistry/Room 470/Research lab**Observation #:** JJ1-OB-006**Date:** 10/18/2022**Contains AOC:** Yes**Contains CBI:** No**Person Interviewed:** Calvin Murphy**Title:** Chemistry Department Safety Coordinator

While inspecting the Room 470 Research Lab, we saw another fume hood that was being used as a hazardous waste SAA. Upon inspection, we saw a 1-gallon poly container, in front of a blue bin, that was marked with a hazardous waste label but was not marked with a hazard risk/indicator.

Inspection Date(s): October 18-19, 2022

We also saw a black bin, labeled "Chemstockroom CB 150," inside the fume hood that contained several hazardous waste SAA containers. Inside the bin we saw a 5-gallon poly container that was marked with a hazardous waste label but was not marked with a hazard risk/indicator. We also saw a 1-gallon glass container that was marked with a hazardous waste label but was not marked with a hazard risk/indicator.

We also saw a white bin that held various waste SAA containers. During the inspection of the white bin, we saw the following three small waste containers and two vials, some requiring waste determinations, with no hazardous waste labeling and no hazard risks/indicators.

- One brown, pint-sized glass container that was labeled, "Unknown Concentration of free [Ni ++] Spiegel Lab 470"
- One small glass bottle containing ~4-ounces of an unknown liquid.
- One small broken top plastic bottle that was labeled "Sodium Phosphate Dibasic, Anhydrous" that was also not closed.
- Two small vials with unknown contents.

Prior to leaving the research lab, I asked Mr. Carlton for an inventory of the containers along with a copy of the safety data sheets.

Photo(s)

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10. [IMG_0180.jpg](#)

Building: Chemistry/Room 410/Research lab

Observation #: JJ1-OB-007

Date: 10/18/2022

Contains AOC: Yes

Contains CBI: No

Person Interviewed: Calvin Murphy

Title: Chemistry Department Safety Coordinator

While in the Room 410 research lab, we inspected the fume hood SAA. During the inspection, we saw a 1-gallon, brown glass waste container that was labeled "A." We saw a sign posted on the outside of the fume hood that listed all of the waste chemicals that were being added to the "A" container. At the time of the inspection, the waste container was not marked with a hazardous waste label and was not marked with a hazard risk/indicator. Mr. Carlton confirmed that it was a waste container and needed to be labeled.

Photo(s)

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3. [IMG_0183.jpg](#)

Inspection Date(s): October 18-19, 2022

Building: Chemistry/Room 412/Research lab			
Observation #: JJ1-OB-008	Date: 10/18/2022	Contains AOC: Yes	Contains CBI: No
Person Interviewed: Calvin Murphy		Title: Chemistry Department Safety Coordinator	
While in the Room 412 research lab, we inspected the fume hood SAA. During the inspection, we saw the following wastes/waste containers that required hazard risks/indicators and/or waste determinations: • One, 1-gallon hazardous waste SAA container with no hazard risk/indicator. • One, pint size hazardous waste SAA container with no hazard risk/indicator. • One, small brown bottle with green tape contains an unknown.			
Photo(s) 1. IMG_0184.jpg 2. IMG_0185.jpg 3. IMG_0186.jpg 4. IMG_0187.jpg 5. IMG_0188.jpg			

Building: Chemistry/Room 150/Chemical Stock Room			
Observation #: JJ1-OB-009	Date: 10/18/2022	Contains AOC: Yes	Contains CBI: No
Person Interviewed: Calvin Murphy		Title: Chemistry Department Safety Coordinator	
While in the Room 150, Chemical Stock Room, we saw an abundance of chemicals in location sections 300 through 347. According to Mr. Carlson the chemicals came from decommissioned labs. Mr. Carlson told me that after being inventoried, anything older than a year is disposed of as waste. I looked at all the chemicals and saw that the inventory dates marked on the chemicals ranged from 6/3/19 to 6/6/19. I asked for an inventory of the chemicals and an SDS for each. While in the stock room I overheard Mr. Carlson telling Mr. Murphy that if any chemicals are older than a year it can go for disposal. Messrs. Carlton and Murphy then told me they try to get labs to re-use these chemicals when possible. I asked when the last time was that someone drew from the stock of the chemicals. Mr. Murphy stated that he wasn't sure about anything prior to June 2022, but said that since June 2022, there had been four requests and only two items taken. Based on the inventory dates, these chemicals from decommissioned labs have been wastes in accumulation since June of 2020. I asked about weekly inspections and was told that these chemicals were not on the weekly inspection schedule. I received an inventory of these waste chemicals, and the inventory is included in the document log of this inspection report. I obtained an inventory of the chemicals that came from the decommissioned labs during the inspection and Mr. Carlton emailed additional inventories on 10/18/22.			
Document(s) 1. All Hazard Inventory Report for CB-Morse Hall 150_S.xlsx 2. Inventory Report for CB-Morse Hall 150 (10-18-2022).xlsx 3. WWU Chemistry stockroom current inventory list.pdf			

Photo(s)

1. [IMG_0190.jpg](#)
2. [IMG_0191.jpg](#)
3. [IMG_0192.jpg](#)
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Building: Biology/Room 436/Research lab**Observation #:** JJ1-OB-010**Date:** 10/18/2022**Contains AOC:** Yes**Contains CBI:** No**Person Interviewed:** Peter Thut**Title:** Biology Department Safety Coordinator

While inspecting the Room 436 research lab we saw a waste container inside of the fume hood SAA. At the time of the inspection, there was a container that was approximately 1-gallon in size. The container was marked/labeled with the words "Hazardous Waste" and a hazard risk/indicator. The lid on the container was not making a complete seal with the container because the container was lined with a plastic bag that prevented the container lid from closing properly. The container was not closed. At the time of the inspection, no one was working in this area, actively adding or removing waste.

While there, Mr. Carlton explained to us that they manage their Ethidium Bromide contaminated PPE as hazardous waste. He explained that Ethidium Bromide was extremely toxic and that it would bind to ones DNA. Mr. Carlton also said that they have two different Ethidium Bromides that they use and one SDS indicates that it's non-hazardous and the other SDS indicates that it is hazardous, so to be safe they manage it as hazardous waste.

At the time of the inspection, I requested a copy of each Ethidium bromide SDS.

Photo(s)

1. [IMG_0197.jpg](#)
2. [IMG_0198.jpg](#)
3. [IMG_0199.jpg](#)

Building: Biology/Room 364/Research lab**Observation #:** JJ1-OB-011**Date:** 10/18/2022**Contains AOC:** Yes**Contains CBI:** No**Person Interviewed:** Peter Thut**Title:** Biology Department Safety Coordinator

While in the Room 364 research lab, we inspected the fume hood SAA. We saw three, pint sized hazardous waste SAA containers inside the fume hood. At the time of the inspection, one of the pint sized hazardous waste SAA containers was not marked with a hazard risk/indicator.

Photo(s)

1. [IMG_0201.jpg](#)
2. [IMG_0202.jpg](#)

Building: Biology/Room 246/Biology stockroom

Inspection Date(s): October 18-19, 2022

Observation #: JJ1-OB-012	Date: 10/18/2022	Contains AOC: Yes	Contains CBI: No
Person Interviewed: Peter Thut		Title: Biology Department Safety Coordinator	
While in the Room 246 biology stockroom, we inspected the fume hood SAA. At the time of the inspection, there was a 1-gallon paint can inside of a fume hood that held small vials of reptile eggs in alcohol. Mr. Thut told us that this was a waste. The container and vials were not labeled with the words "Hazardous Waste" and were not marked with a hazard risk/indicator. The 1-gallon paint can was also not closed. At the time of the inspection, no one was working in this area, actively adding or removing waste.			
Photo(s) 1. IMG_0204.jpg 2. IMG_0205.jpg 3. IMG_0206.jpg			

Building: Biology/Room 131A/Aerosol can pop room			
Observation #: JJ1-OB-013	Date: 10/18/2022	Contains AOC: Yes	Contains CBI: No
Person Interviewed: Peter Thut		Title: Biology Department Safety Coordinator	
Upon entering Room 131A, we saw a walk-in fume hood on the left. Inside the walk-in fume hood, we saw a 30-gallon SAA container with attached aerosol can popper and filter. WWU manages their waste aerosol cans as hazardous waste. While inspecting the container, we saw that the container was not closed during the inspection. The cover for the can popper was not closed. We also saw that residual waste liquids from can popping had somehow leaked down the side of the container and had run beneath and around the bottom of the container. While moving the container around to find a hazardous waste label, waste paint started running out from beneath the container. We first thought the container may have been leaking, but soon discovered that it was just waste paint that had pooled beneath it. We also saw that not all the waste aerosol can contents/residual was making it into the waste container. On the right side of the room, we saw a bin of aerosol cans on the counter. According to Mr. Carlton they were waste aerosols generated from various locations on campus and came from the Engineering building. At the time of the inspection there were 32 waste aerosol cans in the bin. Neither the bin nor the individual waste aerosol cans were labeled with the words "Hazardous Waste" or marked with hazard risks/indicators.			

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Photo(s)

1. [IMG_0208.jpg](#)
2. [IMG_0209.jpg](#)
3. [IMG_0210.jpg](#)
4. [IMG_0215.jpg](#)
5. [IMG_0216.jpg](#)
6. [IMG_0217.jpg](#)
7. [IMG_0219.jpg](#)
8. [IMG_0220.jpg](#)
9. [IMG_0221.jpg](#)
10. [IMG_0222.jpg](#)
11. [IMG_0223.jpg](#)
12. [IMG_0224.jpg](#)
13. [IMG_0225.jpg](#)
14. [IMG_0226.jpg](#)
15. [IMG_0227.jpg](#)

Building: Interdisciplinary Science Building (ISB)/Room 119 Chemical Waste/Toxic Area**Observation #:** JJ1-OB-014**Date:** 01/04/2023**Contains AOC:** Yes**Contains CBI:** No**Person Interviewed:** Gary Carlton**Title:** Safety Officer

While inspecting the wastes in the Toxic area, I saw a tub that contained a pint size container of waste that was not marked with a hazard risk/indicator.

Photo(s)

1. [IMG_0228.jpg](#)
2. [IMG_0229.jpg](#)
3. [IMG_0230.jpg](#)
4. [IMG_0231.jpg](#)

Building: Interdisciplinary Science Building (ISB)/Room 119 Chemical Waste/Acid corrosive area**Observation #:** JJ1-OB-015**Date:** 10/18/2022**Contains AOC:** Yes**Contains CBI:** No**Person Interviewed:** Gary Carlton**Title:** Safety Officer

While inspecting the waste in the acid corrosive area, I saw a 1-gallon container of waste acid that was not marked with a hazard risk/indicator.

Photo(s)

1. [IMG_0232.jpg](#)
2. [IMG_0233.jpg](#)
3. [IMG_0234.jpg](#)

Inspection Date(s): October 18-19, 2022

Building: Interdisciplinary Science Building (ISB)/Room 119 Chemical Waste/Halogenated flammable neutral area			
Observation #: JJ1-OB-016	Date: 10/18/2022	Contains AOC: Yes	Contains CBI: No
Person Interviewed: Gary Carlton		Title: Safety Officer	
While inspecting the waste in the halogenated flammable neutral area, I saw a 1-gallon container of waste that was not marked with a hazard risk/indicator.			
Photo(s) 1. IMG_0235.jpg 2. IMG_0236.jpg			

Building: Interdisciplinary Science Building (ISB)/Room 119 Chemical Waste/Non-halogenated flammable neutral area			
Observation #: JJ1-OB-017	Date: 10/18/2022	Contains AOC: Yes	Contains CBI: No
Person Interviewed: Gary Carlton		Title: Safety Officer	
While inspecting the waste in the non-halogenated flammable neutral area, I saw a 1-gallon can of waste that was not marked with a hazard risk/indicator.			
Photo(s) 1. IMG_0237.jpg 2. IMG_0238.jpg 3. IMG_0239.jpg			

Building: Interdisciplinary Science Building (ISB)/Room 119 Chemical Waste/Walk-in fume hood			
Observation #: JJ1-OB-018	Date: 10/18/2022	Contains AOC: Yes	Contains CBI: No
Person Interviewed: Gary Carlton		Title: Safety Officer	
At the time of the inspection, I saw two, 55-gallon hazardous waste containers. One of the containers was inside of the walk-in fume hood and the other was just outside of it. The 55-gallon container, just outside of the fume hood, was labeled as containing "Halogenated flammable neutral waste." At the time of the inspection, the container was not labeled with the words "Hazardous Waste" or marked with a hazard risk/indicator. Mr. Carlton applied a hazardous waste label to the container and marked the hazard risk/indicator during the inspection. The 55-gallon container, located inside the fume hood, was labeled as containing "Flammable acid waste." At the time of the inspection, the container was not labeled with the words "Hazardous Waste," marked with a hazard risk/indicator, or closed. Mr. Carlton applied a hazardous waste label to the container, marked the hazard risk/indicator, and closed the container during the inspection.			

Photo(s)

1. [IMG_0240.jpg](#)
2. [IMG_0241.jpg](#)
3. [IMG_0242.jpg](#)
4. [IMG_0243.jpg](#)
5. [IMG_0244.jpg](#)
6. [IMG_0245.jpg](#)
7. [IMG_0246.jpg](#)
8. [IMG_0247.jpg](#)
9. [IMG_0248.jpg](#)
10. [IMG_0249.jpg](#)
11. [IMG_0250.jpg](#)

Building: College of Environmental Studies/Room 503/Institute for Watershed Studies Lab

Observation #: JJ1-OB-019

Date: 10/18/2022

Contains AOC: Yes

Contains CBI: No

Person Interviewed: Scott Wilkinson

Title: Lab Classroom Support Technician

While in the Watershed Studies lab we saw the following containers of waste that were labeled with the words "Hazardous Waste" but were not marked with a hazard risk/indicator.

- 1-gallon gray poly container
- One pint size brown glass bottle
- One medium sized zip-lock bag

We also saw several containers that were connected to lab analyzing equipment. I asked Mr. Carlton if the containers held waste and at the time of the inspection he did not know and he was unable to find anyone in the area that knew. Following the inspection, Mr. Carlton provided information and photos via SharePoint indicating that the containers in question held hazardous waste and had since been labeled as hazardous waste.

Photo(s)

1. [IMG_0251.jpg](#)
2. [IMG_0252.jpg](#)
3. [IMG_0253.jpg](#)
4. [IMG_0254.jpg](#)
5. [IMG_0255.jpg](#)
6. [IMG_0256.jpg](#)
7. [IMG_0257.jpg](#)
8. [IMG_0258.jpg](#)
9. [IMG_0259.jpg](#)
10. [IMG_0260.jpg](#)

Building: Engineering Technology/Waste shed/Outside and adjacent to the Engineering Tech Building

Observation #: JJ1-OB-020

Date: 10/18/2022

Contains AOC: Yes

Contains CBI: No

Person Interviewed: Gary Carlton**Title:** Safety Officer

We arrived outside the Engineering Tech building and Mr. Carlton took us over to a large, white, portable hazardous materials shed that he told us was being used as a SAA for hazardous waste. When the shed was opened, I inspected the contents and saw the following wastes:

- One 30-gallon container that was labeled as containing brake fluid.
- One 30-gallon container that was labeled as containing spent antifreeze.
- One 55-gallon container with attached closed funnel that was labeled as containing used oil.

There was also a gray bin on the floor of the shed that held an old red, poly gas can that was labeled with a hazardous waste label, hazard risk/indicator, and the words "Waste Gas." The container held approximately four gallons of waste gas and according to facility personnel the container had been on-site for years. The bin also held an old engine oil product poly container that was approximately 2.5 gallons in size. The container was labeled with the words "Old Gas." The container held approximately two quarts of waste gas and was not labeled with a hazardous waste label or marked with a hazard risk/indicator.

There were some shelves inside the shed that also held the following wastes:

- Three, 1-gallon paint cans labeled with hazardous waste labels and marked with hazard risks/indicators.
- One, 1-quart paint can, labeled with hazardous waste label and marked with hazard risk/indicator.
- Two, 1-pint containers labeled with hazardous waste labels and marked with hazard risks/indicators.
- Two, 4-ounce tubes labeled with hazardous waste labels and marked with hazard risks/indicators.
- Seven, 3 to 4-ounce small poly containers in partitioned box. all seven were labeled with hazardous waste labels, but only three were marked with hazard risk/indicator. Four of the containers were not marked with a hazard risk/indicator.
- One, 1-gallon black poly container labeled with hazardous waste label and marked with hazard risk/indicator.
- One, 1-quart metal container labeled with hazardous waste label and marked with hazard risk/indicator and marked with an accumulation start date (ASD) of 3/31/22. Based on the ASD, the container has been in accumulation for greater than 90-days.
- There was also a recycle tote that held seven waste aerosol cans. The waste aerosols were not labeled with hazardous waste labels or marked with hazard risks/indicators.

At the time of the inspection, the shed and its contents were not SAA wastes, but rather CAA wastes. The wastes being accumulated in the shed were not at or near the point of generation and not in control of the operator, as the waste shed was not secure from unauthorized access. The waste shed was not locked up. I asked Mr. Carlton if weekly inspections were being conducted at the shed. Mr. Carlton stated that the shed, outside the Engineering Tech building, may be on the inspection schedule and said that he would check on that.

Photo(s)

1. [IMG_0262.jpg](#)
2. [IMG_0278.jpg](#)
3. [IMG_0279.jpg](#)
4. [IMG_0280.jpg](#)
5. [IMG_0281.jpg](#)
6. [IMG_0282.jpg](#)
7. [IMG_0283.jpg](#)
8. [IMG_0284.jpg](#)
9. [IMG_0285.jpg](#)
10. [IMG_0286.jpg](#)
11. [IMG_0287.jpg](#)
12. [IMG_0288.jpg](#)
13. [IMG_0289.jpg](#)
14. [IMG_0290.jpg](#)
15. [IMG_0291.jpg](#)
16. [IMG_0292.jpg](#)

Building: Engineering Technology/Polymer Materials Engineering (PME) paint booth/Flammable cabinet

Observation #: JJ1-OB-021

Date: 10/18/2022

Contains AOC: Yes

Contains CBI: No

Person Interviewed: Sean Ryan

Title: Research Associate

While inspecting the contents of a flammable cabinet, I saw a 5-gallon SAA container that was marked with the words, "Mixed Solvent Waste." At the time of the inspection, the container was not labeled with the words "Hazardous Waste" and was not closed. At the time of the inspection, no one was working in this area, actively adding or removing waste. The lid was not screwed onto the container and was offset, not making a complete seal with the container. A hazard risk/indicator remained on the container from initial product labeling and was appropriate for the waste inside the container.

Photo(s)

1. [IMG_0263.jpg](#)
2. [IMG_0264.jpg](#)
3. [IMG_0265.jpg](#)

Building: Engineering Technology/Polymer Materials Engineering (PME) paint booth

Observation #: JJ1-OB-022

Date: 10/18/2022

Contains AOC: Yes

Contains CBI: No

Person Interviewed: Sean Ryan

Title: Research Associate

While in the room that contained the paint booth, I saw multiple containers inside of a plastic tote. I asked about the contents of the tote and was told by Mr. Ryan that the tote held wastes that were generated by an employee on 9/10/22. Mr. Ryan stated that the employee was no longer employed with WWU. At the time of the inspection, neither the tote nor any of the wastes in the tote were labeled with the words "Hazardous Waste" or marked with a hazard risk/indicator. An inspection of the wastes inside the tote indicated the hazard risk/indicator would be for ignitability (D001), due to wording on the containers such as "Extremely

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Flammable." According to Mr. Ryan, the tote containing the wastes had been in the paint booth room since 9/10/22 without being designated. Prior to leaving the paint booth room, I asked Mr. Ryan for an inventory of the wastes in the tote, including how the waste will be managed and Safety Data Sheets (SDS) for each waste.

Photo(s)

1. [IMG_0266.jpg](#)
2. [IMG_0267.jpg](#)
3. [IMG_0268.jpg](#)
4. [IMG_0269.jpg](#)
5. [IMG_0270.jpg](#)
6. [IMG_0271.jpg](#)
7. [IMG_0272.jpg](#)
8. [IMG_0273.jpg](#)
9. [IMG_0274.jpg](#)
10. [IMG_0275.jpg](#)
11. [IMG_0276.jpg](#)
12. [IMG_0277.jpg](#)

Building: Psychology - Academic Instructional East/Room 542/Fume hood

Observation #: JJ1-OB-023

Date: 10/19/2022

Contains AOC: Yes

Contains CBI: No

Person Interviewed: Nathan Long

Title: Instructional Classroom Support Technician

While inspecting the contents of a fume hood SAA in room 542, I saw two bins, each with multiple containers. There were a total of eight containers in the two bins that were labeled with the words "Waste." At the time of the inspection, none of the eight containers were labeled with either the words "Hazardous Waste" or marked with hazard risks/indicators. The containers that were labeled were identified as "Stain," "4% formalin," "Wright-Giemsa," "4% PFA," "DI Waste," and "Wright-Giemsa Buffer."

Photo(s)

1. [IMG_0295.jpg](#)
2. [IMG_0296.jpg](#)
3. [IMG_0297.jpg](#)
4. [IMG_0298.jpg](#)
5. [IMG_0299.jpg](#)
6. [IMG_0300.jpg](#)
7. [IMG_0301.jpg](#)
8. [IMG_0302.jpg](#)
9. [IMG_0304.jpg](#)
10. [IMG_0305.jpg](#)

Building: Psychology - Academic Instructional East/Room 532/Fume hood

Observation #: JJ1-OB-024

Date: 10/19/2022

Contains AOC: Yes

Contains CBI: No

Person Interviewed: Nathan Long

Title: Instructional Classroom Support Technician

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While inspecting the contents of the room 532 fume hood SAA, I saw the following three containers that were not marked with a hazard risk/indicator:

- One, 1-gallon plastic container had a hazardous waste label, but no hazard risk/indicator.
- One, pint/quart sized container had a hazardous waste label, but no hazard risk/indicator.
- One, 1-gallon brown, glass reagent bottle had a hazardous waste label, but no hazard risk/indicator.

Photo(s)

1. [IMG_0306.jpg](#)
2. [IMG_0307.jpg](#)
3. [IMG_0308.jpg](#)
4. [IMG_0309.jpg](#)
5. [IMG_0310.jpg](#)
6. [IMG_0311.jpg](#)

Building: Art Annex/Room 51/Glaze Room**Observation #:** JJ1-OB-025**Date:** 10/19/2022**Contains AOC:** Yes**Contains CBI:** No**Person Interviewed:** Ryan Kelly**Title:** Associate Professor of Art, Ceramics

While in the Glaze room, I saw an area beneath a countertop that was identified with a small marking as "EHS GLAZE WASTE." While inspecting this area, I saw two, 5-gallon SAA containers and one 1/2-gallon SAA container that held waste glaze. According to Mr. Carlton, waste glaze is allowed to dry out prior to disposal, and it's disposed of as toxic hazardous waste. At the time of the inspection, the three containers were not closed, not labeled with the words "Hazardous Waste," and not marked with hazard risks/indicators. At the time of the inspection, no one was working in this area, actively adding or removing waste. According to Mr. Carlton, the glazes contain heavy metals.

Photo(s)

1. [IMG_0312.jpg](#)
2. [IMG_0313.jpg](#)
3. [IMG_0314.jpg](#)
4. [IMG_0315.jpg](#)
5. [IMG_0316.jpg](#)
6. [IMG_0317.jpg](#)
7. [IMG_0318.jpg](#)

Building: Fine Arts/Room 214/Printmaking Classroom**Observation #:** JJ1-OB-026**Date:** 10/19/2022**Contains AOC:** No**Contains CBI:** No**Person Interviewed:** Doug Loewen**Title:** Classroom Instructional Technician-Art

While inspecting the printmaking classroom, we saw three step-can containers that were being used to accumulate rags that were contaminated with ink. The three step-cans were labeled with the words, "Excluded Solvent Contaminated Rags." According to Mr. Carlton, rags not designated as RCRA rags are laundered by Aramark.

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Photo(s)

1. [IMG_0321.jpg](#)

Building: Fine Arts/Room FI240/Painting Studio**Observation #:** JJ1-OB-027**Date:** 10/19/2022**Contains AOC:** Yes**Contains CBI:** No**Person Interviewed:** Doug Loewen**Title:** Classroom Instructional Technician-Art

While inspecting the paint studio, we saw a small backroom that was being used as an SAA. After entering the SAA, we saw a 30-gallon container with an attached funnel. The container was marked with a hazardous waste label and a hazard risk/indicator. According to the container labeling, it was being used to accumulate waste paint related material. I pushed on the container to determine how full it was and determined that it held approximately 15 gallons of waste. At the time of the inspection, the container was not closed. The funnel lid was not latched, and the lid was not making a complete seal with the funnel. Mr. Carlton latched the funnel lid during the inspection, closing the container.

The SAA container was next to a flammable storage cabinet. I inspected the flammable storage cabinet and its contents. Upon opening the cabinet, I saw a 5-gallon plastic container in the bottom of the cabinet as well as other various containers. The 5-gallon plastic container and other smaller containers contained unknown liquids, and none were marked or labeled.

Prior to leaving the Fine Arts, Room FI240 SAA, I asked Mr. Carlton to send me an inventory of the flammable cabinet along with a determination of the contents.

Photo(s)

1. [IMG_0322.jpg](#)
2. [IMG_0323.jpg](#)
3. [IMG_0324.jpg](#)
4. [IMG_0325.jpg](#)
5. [IMG_0326.jpg](#)
6. [IMG_0327.jpg](#)

SECTION III – RECORDS REVIEW**Record:** Manifests**AOC:** Yes**Ref #:** JJ1-RR-001**Reviewed By:** Jon Jones**Reviewed Date:** 10/18/2022

Prior to the inspection, while conducting a file review, I saw that WWU had not notified as a healthcare facility subject to the requirements of Part 266, Subpart P. During the inspection I asked for copies of the facility's disposal paperwork for the HWPharms. Ms. Thistle told me that she would send me the disposal paperwork. I received disposal paperwork from Ms. Thistle the same day, October 18, 2022, via email. The documentation included a Pharmaceutical Waste Characterization Checklist that Stericycle provided to the health clinic. According to the information in the checklist, health clinic personnel submitted information in the checklist indicating that the WWU Health Clinic is a very small quantity generator (VSQG) of hazardous waste. It also indicates that the clinic notified under Part 266, Subpart P and includes a list of the following items that are in stock or used at the clinic:

- Silver Sulfadiazine, silvadine (D011)

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- Afrin nasal spray (D009)
- Multi-dose flu vaccine (D009)
- Isopropanol (D001)
- Alcohol based gels, lotions, sprays, and creams (D001)
- Aspirin
- Ibuprofen
- Naproxen
- Acetaminophen
- Fexofenadine (Allegra)
- Loratadine
- Diphenhydramine
- Guaifenesin
- Amoxicillin
- Doxycycline
- Metronidazole
- Prednisone (MN01 for MN)
- Lidocaine
- HFA Inhaler with propellant (Potential D001)
- Silver nitrate applicators (D001, D011)

Ms. Thistle's email also included copies of invoices and disposal paperwork that included the following hazardous waste manifest:

- 200182545CLE

I reviewed the information on the manifest and saw that the special handling block indicated that the waste was flammable toxic pharmaceuticals however, the word "PHARMS"/"PHRMS" was not included in Item 13 of the manifest (EPA Form 8700-22).

Document(s)

1. SteriCycle Checklist 5-26-22.pdf
2. Stericycle Invoice 06.30.2022.pdf
3. Stericycle June 2022 Invoice.pdf
4. Stericycle Pharmaceutical Waste Checklist.pdf

Record: Inspections

AOC: Yes

Ref #: JJ1-RR-002

Reviewed By: Jon Jones

Reviewed Date: 10/19/2022

During the inspection I reviewed the last three years of weekly hazardous waste inspection logs for weekly inspections that were conducted in Room 141 of the Chemistry building, the waste shed outside of the Engineering Tech building, and the ISB CAA.

During my review, I saw that 10 weekly inspections were not conducted in Room 141 of the Chemistry building for the following weeks:

- 3/22-28/20
- 3/29/20-4/4/20
- 4/5-11/20
- 5/10-16/20
- 5/17-23/20
- 6/7-13/20
- 7/12-18/20
- 9/6-12/20

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- 9/13-19/20
- 6/20-26/21

During my review, I saw that 18 weekly inspections were not conducted at the waste shed outside of the Engineering Tech building for the following weeks:

- 12/15-21/19
- 12/22-28/19
- 1/12-18/20
- 3/22-28/20
- 3/29/20-4/4/20
- 4/5-4/11/20
- 5/17-23/20
- 6/7-13/20
- 7/12-18/20
- 8/9-15/20
- 9/6-12/20
- 9/13-19/20
- 12/13-19/20
- 6/20-26/21
- 12/19-25/21
- 12/26/21-1/1/22
- 2/13-19/22

When I asked about the weekly hazardous waste inspection logs for the ISB CAA, Mr. Carlton told us that no inspections had been conducted since it opened in June of 2022. Since June of 2022 the facility failed to conduct 19 weekly hazardous waste inspections.

A total of 47 weekly hazardous waste inspections for the sites listed above were not conducted.

Record: Exception Reports**AOC: Yes****Ref #:** JJ1-RR-003**Reviewed By:** Jon Jones**Reviewed Date:** 10/19/2022

During the inspection of the facility's hazardous waste manifests, manifest 017264524FLE was identified as not being received by the designated facility (TSDF) within 45 days. The manifest was signed by the designated facility 48 days after being shipped. The waste listed on the manifest was shipped on 8/11/22 and signed by the designated facility on 9/28/22. At the time of the inspection, the facility was unable to produce a copy of an exception report that had been submitted to Ecology for the shipment.

Record: Manifests**AOC: Yes****Ref #:** JJ1-RR-004**Reviewed By:** Jon Jones**Reviewed Date:** 10/19/2022

During the inspection of the facility's hazardous waste manifests, the facility was not in possession of the following eight manifests that had been signed by the designated facility:

- 014224837FLE, dated 10/21/19 or 10/31/19 (Date on manifest was not legible)
- 014224466FLE, dated 12/20/19
- 013299948FLE, dated 8/12/21
- 015728777FLE, dated 11/4/21
- 016449216FLE, dated 12/1/21
- 017194056FLE, dated 5/19/22

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- 017194055FLE, dated 6/8/22
- 017264521FLE, dated 8/11/22

Copies of these manifests, signed by the designated facility, were received from the facility on 11/2/22. Included in the response were four additional manifests that the facility must have identified as not being signed by the designated facility, following the inspection. The following additional manifests are included in the document log of this report:

- 014804885FLE
- 015813905FLE
- 016909892FLE
- 017264524FLE

Document(s)

1. 014224837FLE.pdf
2. 014224466FLE.pdf
3. 013299948FLE.pdf
4. 015728777FLE.pdf
5. 016449216FLE.pdf
6. 017194056FLE.pdf
7. 017194055FLE.pdf
8. 017264521FLE.pdf
9. 014804885FLE.pdf
10. 015813905FLE.pdf
11. 016909892FLE.pdf
12. 017264524FLE.pdf

Record: Personnel Training**AOC:** Yes**Ref #:** JJ1-RR-005**Reviewed By:** Jon Jones**Reviewed Date:** 01/12/2023

A review of the training documentation, for personnel that manage/handle hazardous waste, received from WWU on 11/2/22 indicated that there is no record of training for at least nine members of the WWU faculty. There was also no documented hazardous waste training for Mr. Gary Carlton, Safety Officer.

Also, the following individuals conducted weekly hazardous waste inspections and there is no record of these personnel receiving any hazardous waste training:

- Emmy Formiga
- Kevin Nolasco
- Meghan Burke
- Dylen Cherry
- Sally Vanx

The individuals listed above conducted weekly hazardous waste inspections at the Chemistry Building CAA in room 141 and the Engineering Technology Building.

There were also no records of any universal waste training or hazardous waste pharmaceuticals training for any facility personnel or faculty.

Document(s)

1. Dangerous Waste Training Plan 06_11_21.doc
2. Hazardous Waste Training Record 11_2_22.xlsx
3. LabSafety_2022-2023_Compiled.pdf

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4. Procedure for Bulking Hazardous Liquids 9_16_2021.docx
5. StudentHealthCenter_All Staff Training list - .xlsx

SECTION IV – AREAS OF CONCERN

The presentation of areas of concern does not constitute a formal compliance determination or violation.

Building: Health Services	Area: Health Clinic	Sub-area: Health Clinic Storeroom
JJ1-OB-001		
While in the stockroom, we saw a red container that was labeled with the words "Chemical Waste Disposal." At the time of the inspection, the container was not closed and held four smaller containers that were labeled as containing "10% Neutral Buffered Formalin." According to clinic personnel, the waste was pathology waste and a State of Washington only, toxic waste. It was also noted that the container was also not labeled with the words "Hazardous Waste" or "Dangerous Waste" and was not marked with a hazard risk/indicator label.	Citations:	Sections:
Building: Health Services	Area: Health Clinic	Sub-area: Health Clinic Storeroom
JJ1-OB-001		
Adjacent to the "Chemical Waste Disposal" container, we saw another red container that held a mix of waste batteries. At the time of the inspection, the container was not labeled with either the words "Universal Waste - Batteries," "Waste Batteries," or "Used Batteries." There was also no date on the container to indicate when the first waste battery was placed inside of the container and no other demonstration as to the length of time the batteries had been accumulated. The container held mostly waste alkaline batteries however, at least one waste nickel-cadmium battery was observed inside the container.	Citations:	Sections:

Building: Health Services	Area: Health Clinic	Sub-area: Health Clinic Storeroom
JJ1-OB-001		
There was a black, 15-gallon container that held pharmaceutical waste. At the time of the inspection, the container was labeled with the words "Hazardous Waste Pharmaceuticals" however, there was no marking or labeling with the date the hazardous waste pharmaceuticals (HWPharms) first became a waste. After speaking with clinic personnel regarding the accumulation time of HWPharms it didn't seem as though the clinic was maintaining an inventory system.	Citations:	Sections:
Building: Health Services	Area: Health Clinic	Sub-area: Health Clinic Storeroom
JJ1-OB-001		
There was a 5-gallon satellite accumulation area (SAA) container of waste asthma inhalers. At the time of the inspection, the container was labeled with the words "Hazardous Waste." The container was not marked or labeled with a hazard risk/indicator.	Citations:	Sections:
Building: Health Services	Area: Health Clinic	Sub-area: Health Clinic Storeroom
JJ1-OB-001		
There was a quart sized SAA container of waste Epi pens. At the time of the inspection, the container was labeled with the words "Hazardous Waste." The container was not marked or labeled with a hazard risk/indicator.	Citations:	Sections:
Building: Health Services	Area: Health Clinic	Sub-area: Health Clinic Storeroom
JJ1-OB-001		
There was a 5-gallon SAA container that held waste ammonia inhalers. At the time of the inspection, the container was labeled with the words "Hazardous Waste." The	Citations:	Sections:

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container was not marked or labeled with a hazard risk/indicator.		
Building: Chemistry	Area: Room 141	Sub-area: Universal Waste/Hazardous Waste accumulation area
JJ1-OB-002		
There was a box of waste batteries that held at least one waste lithium battery and one waste nickel-cadmium battery. At the time of the inspection, this box of waste batteries was not labeled as either "Universal Waste - Batteries," "Waste Batteries," or "Used Batteries." The box was also not dated with the date the waste batteries first became a waste. Another box contained a few alkaline batteries and a plastic container that held at least one waste nickel-cadmium battery and one waste nickel-metal hydride battery. The third waste battery container was not labeled as either "Universal Waste - Batteries," "Waste Batteries," or "Used Batteries." The box was also not dated with the date the waste batteries first became a waste. A plastic tub on the floor beneath the desk held approximately seven batteries that looked like either waste nickel-cadmium or waste lithium batteries. The tub was not labeled as either "Universal Waste - Batteries," "Waste Batteries," or "Used Batteries." The tub was also not dated with the date the waste batteries first became a waste.	Citations:	Sections:
Building: Chemistry	Area: Room 141	Sub-area: Universal Waste/Hazardous Waste accumulation area
JJ1-OB-002		
While still in Room 141, we saw two, yellow flammable storage cabinets	Citations:	Sections:

stacked one on top of the other. The top cabinet was marked with the words "Flammable Neutral" and the number 2. I opened the top flammable storage cabinet and saw that it contained a clear plastic tub that held what looked like two old waste chemicals. The smaller of the two was labeled with the words "Not permitted to transport," "Toxic & flammable," and dated "7/94" and "6/19." The original labeling on the container indicated that it held 1-Methyl-3-nitro-1-nitrosoguanidine." According to Mr. Carlton, the "7/94" date was likely when the chemical was received and "6/19" was likely the date when they started tracking to dispose after one year. According to this information, the waste had been in accumulation for greater than 90-days. Based on the date, the actual accumulation time would be 1,217 days. The container was also not labeled with the words "Hazardous Waste."

The larger of the two, was a blue, one-quart sized metal container with a metal lid. The container appeared to be a compressed gas cylinder. According to the labeling on the container, it held "Iron pentacarbonyl - 99.5%." Additional markings indicated that the contents were both flammable and toxic. The container was also dated "6/18." According to Mr. Carlton, the bottle had been sitting in a fridge for 18 years. The labeling on the bottle says to "Store Cold." At the time of the inspection, the bottle was not being stored cold. According to this information, the waste had been in accumulation for greater than 90-days. Based on the date, the actual accumulation time would be 1,582 days. The container was also not labeled with the words "Hazardous Waste."

Building: Chemistry	Area: Room 252	Sub-area: Research lab
JJ1-OB-003		
While in the room 252 research lab, we looked inside of a fume hood and saw a gray plastic tub that held two, 4-liter glass containers of waste with attached funnels with lids and a 5-gallon blue poly container of waste. Both glass waste containers were labeled with the words "Hazardous Waste." One of the glass waste containers was labeled as containing waste acid and the other waste basic. Not only were the two incompatible waste containers being accumulated in the same gray plastic tub, but they were both not closed (funnel lids were not clasped down) and the waste acid container was not marked/labeled with a hazard risk/indicator. The 5-gallon blue poly container was only labeled as "O'Neil - 252" and was also not closed. The 5-gallon poly was not labeled with the words "Hazardous/Dangerous Waste" and was not marked/labeled with a hazard risk/indicator. Mr. Carlton stated that it might be a WT02, WA. State only toxic waste. I explained that a waste determination would need to be made. Adjacent to the gray plastic tub, we saw a clear plastic tub that held two, 4-liter glass containers of waste. The two glass containers were labeled with the words "Hazardous Waste" and each was marked as containing flammable/toxic waste. The two, 4-liter waste containers had attached funnels with lids. At the time of the inspection, both of the, 4-liter, waste containers were not closed. The attached funnels had clasps to keep them closed and one was not clasped down and the other was	Citations:	Sections:

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broken and would not be able to close.		
Building: Chemistry	Area: Room 370	Sub-area: Research lab
JJ1-OB-004		
At the time of the inspection, the container in the front of the tub was closed and labeled with the words "Hazardous Waste" but was not marked/labeled with a hazard risk/indicator. The second glass waste container in the back of the plastic tub was labeled with the words "Hazardous Waste" and marked with a hazard risk/indicator however, it had an attached funnel with lid that was not closed. We also saw another plastic tub in the back of the fume hood and to the right of the tub mentioned above. The plastic tub also held two, 4-liter glass waste containers with attached funnels with lids. At the time of the inspection, the waste container in the tub, on the right, was not closed. The lid on the funnel was not making a complete seal on the funnel.	Citations:	Sections:
Building: Chemistry	Area: Room 480	Sub-area: Isotope lab
JJ1-OB-005		
A 1-quart size, gray, poly waste container with a blue lid that was not closed. The lid was not screwed onto the container. A 5-gallon poly carboy that was marked with a hazardous waste label and a hazard risk/indicator, but the container was missing its lid and was not closed. Mr. Carlton closed the 5-gallon poly carboy container during the inspection. We also saw a smaller container that was labeled as Uranium-238 and dated 11/1/21, requiring a waste determination.	Citations:	Sections:

Building: Chemistry	Area: Room 470	Sub-area: Research lab
JJ1-OB-006		
A 1-gallon poly container, in front of a blue bin, that was marked with a hazardous waste label but was not marked with a hazard risk/indicator. A black bin, labeled "Chemstockroom CB 150," inside the fume hood that contained several hazardous waste SAA containers. Inside the bin we saw a 5-gallon poly container that was marked with a hazardous waste label but was not marked with a hazard risk/indicator. We also saw a 1-gallon glass container that was marked with a hazardous waste label but was not marked with a hazard risk/indicator.	Citations:	Sections:
Building: Chemistry	Area: Room 470	Sub-area: Research lab
JJ1-OB-006		
A white bin that held various waste SAA containers. During the inspection of the white bin, we saw the following three small waste containers and two vials, some requiring waste determinations, with no hazardous waste labeling and no hazard risks/indicators. - One brown, pint-sized glass container that was labeled, "Unknown Concentration of free [Ni ++] Spiegel Lab 470" - One small glass bottle containing ~4-ounces of an unknown liquid. - One small broken top plastic bottle that was labeled "Sodium Phosphate Dibasic, Anhydrous" that was also not closed. - Two small vials with unknown contents.	Citations:	Sections:
Building: Chemistry	Area: Room 410	Sub-area: Research lab
JJ1-OB-007		

A 1-gallon, brown glass waste container that was labeled "A." We saw a sign posted on the outside of the fume hood that listed all of the waste chemicals that were being added to the "A" container. At the time of the inspection, the waste container was not marked with a hazardous waste label and was not marked with a hazard risk/indicator. Mr. Carlton confirmed that it was a waste container and needed to be labeled.	Citations:	Sections:
Building: Chemistry	Area: Room 412	Sub-area: Research lab
JJ1-OB-008		
One, 1-gallon hazardous waste SAA container with no hazard risk/indicator. One, pint size hazardous waste SAA container with no hazard risk/indicator.	Citations:	Sections:
Building: Chemistry	Area: Room 412	Sub-area: Research lab
JJ1-OB-008		
One, small brown bottle with green tape contains an unknown.	Citations:	Sections:
Building: Chemistry	Area: Room 150	Sub-area: Chemical Stock Room
JJ1-OB-009		
We saw an abundance of chemicals in location sections 300 through 347. According to Mr. Carlson the chemicals came from decommissioned labs. Mr. Carlson told me that after being inventoried, anything older than a year is disposed of as waste. I looked at all the chemicals and saw that the inventory dates marked on the chemicals ranged from 6/3/19 to 6/6/19. While in the stock room I overheard Mr. Carlson telling Mr. Murphy that if any chemicals are older than a year it can go for disposal. Messrs. Carlton and Murphy then told me they try to get	Citations:	Sections:

labs to re-use these chemicals when possible. I asked when the last time was that someone drew from the stock of the chemicals. Mr. Murphy stated that he wasn't sure about anything prior to June 2022, but said that since June 2022, there had been four requests and only two items taken. Based on the inventory dates, these chemicals from decommissioned labs have been wastes in accumulation since June of 2020. I asked about weekly inspections and was told that these chemicals were not on the weekly inspection schedule. I received an inventory of these waste chemicals, and the inventory is included in the document log of this inspection report. Waste chemicals have been in accumulation for greater than 90-days.		
Building: Biology	Area: Room 436	Sub-area: Research lab
JJ1-OB-010		
One gallon SAA container of waste Ethidium Bromide was not closed.	Citations:	Sections:
Building: Biology	Area: Room 364	Sub-area: Research lab
JJ1-OB-011		
One pint-size hazardous waste SAA container was not marked with a hazard risk/indicator.	Citations:	Sections:
Building: Biology	Area: Room 246	Sub-area: Biology stockroom
JJ1-OB-012		
A 1-gallon paint can inside of a fume hood that held small vials of reptile eggs in alcohol. The container and vials were not labeled with the words "Hazardous Waste" and were not marked with a hazard risk/indicator. The 1-gallon can was also not closed.	Citations:	Sections:
Building: Biology	Area: Room 131A	Sub-area: Aerosol can pop room
JJ1-OB-013		

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30-gallon container with attached aerosol can popper. - Container was not closed during the inspection. - Residual waste liquids from can popping had somehow leaked down the side of and beneath the bottom of the container. Neither a small plastic tub of waste aerosols nor the 32 individual waste aerosol cans were labeled with the words "Hazardous Waste" or marked with a hazard risk/indicator.	Citations:	Sections:
Building: Interdisciplinary Science Building (ISB)	Area: Room 119 Chemical Waste	Sub-area: Toxic Area
JJ1-OB-014		
While inspecting the wastes in the Toxic area, I saw a bin that contained a pint size container of waste that was not marked with a hazard risk/indicator.	Citations:	Sections:
Building: Interdisciplinary Science Building (ISB)	Area: Room 119 Chemical Waste	Sub-area: Acid corrosive area
JJ1-OB-015		
While inspecting the waste in the acid corrosive area, I saw a 1-gallon container of waste acid that was not marked with a hazard risk/indicator.	Citations:	Sections:
Building: Interdisciplinary Science Building (ISB)	Area: Room 119 Chemical Waste	Sub-area: Halogenated flammable neutral area
JJ1-OB-016		
I saw a 1-gallon container of waste that was not marked with a hazard risk/indicator.	Citations:	Sections:
Building: Interdisciplinary Science Building (ISB)	Area: Room 119 Chemical Waste	Sub-area: non-halogenated flammable neutral area
JJ1-OB-017		

I saw a 1-gallon container of waste that was not marked with a hazard risk/indicator.	Citations:	Sections:
Building: Interdisciplinary Science Building (ISB)	Area: Room 119 Chemical Waste	Sub-area: Stand-up fume hood
JJ1-OB-018		
The 55-gallon container, just outside of the fume hood, was not labeled with the words "Hazardous Waste" or marked with a hazard risk/indicator. Mr. Carlton applied a hazardous waste label to the container and marked the hazard risk/indicator during the inspection. The 55-gallon container, located inside the fume hood, was not labeled with the words "Hazardous Waste," marked with a hazard risk/indicator, or closed. Mr. Carlton applied a hazardous waste label to the container, marked the hazard risk/indicator, and closed the container during the inspection.	Citations:	Sections:
Building: College of Environmental Studies	Area: Room 503	Sub-area: Institute for Watershed Studies Lab
JJ1-OB-019		
While in the Watershed Studies lab we saw the following containers of waste that were labeled with the words "Hazardous Waste" but were not marked with a hazard risk/indicator. • 1-gallon gray poly container • One pint size brown glass bottle • One medium sized zip-lock bag	Citations:	Sections:
Building: Engineering Technology	Area: Waste shed	Sub-area: Outside and adjacent to the Engineering Tech Building
JJ1-OB-020		
There was a gray bin on the floor of the shed that held an old red, poly gas can that was labeled with a hazardous waste label, hazard	Citations:	Sections:

risk/indicator, and the words "Waste Gas." The container held approximately four gallon of waste gas and according to facility personnel the container had been on-site for years. The bin also held an old engine oil product poly container that was approximately 2.5 gallons in size. The container was labeled with the words "Old Gas." The container held approximately two quarts of waste gas and was not labeled with a hazardous waste label or marked with a hazard risk/indicator.

There were some shelves inside the shed that also held the following wastes:

- Three, 1-gallon paint cans labeled with hazardous waste labels and marked with hazard risks/indicators.
- One, 1-quart, paint can labeled with hazardous waste label and marked with hazard risk/indicator.
- Two, 1-pint containers labeled with hazardous waste labels and marked with hazard risks/indicators.
- Two, 4-ounce tubes labeled with hazardous waste labels and marked with hazard risks/indicators.
- Seven, 3 to 4-ounce small poly containers in partitioned box. all seven were labeled with hazardous waste labels, but only three were marked with hazard risk/indicator. Four of the containers were not marked with a hazard risk/indicator.
- One, 1-gallon black poly container labeled with hazardous waste label and marked with hazard risk/indicator.
- One, 1-quart metal container labeled with hazardous

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waste label and marked with hazard risk/indicator and marked with an accumulation start date (ASD) of 3/31/22. Based on the ASD, the container has been in accumulation for greater than 90-days. There was also a recycle tote that held seven waste aerosol cans. The waste aerosols were not labeled with hazardous waste labels or marked with hazard risks/indicators. At the time of the inspection, the shed and its contents were not SAA wastes, but rather CAA wastes.		
Building: Engineering Technology	Area: Polymer Materials Engineering (PME) paint booth	Sub-area: Flammable cabinet
JJ1-OB-021		
While inspecting the contents of a flammable cabinet, I saw a 5-gallon SAA container that was marked with the words, "Mixed Solvent Waste." At the time of the inspection, the container was not labeled with the words "Hazardous Waste" and was not closed.	Citations:	Sections:
Building: Engineering Technology	Area: Polymer Materials Engineering (PME) paint booth	Sub-area:
JJ1-OB-022		
I saw multiple containers inside of a plastic tote. I asked about the contents of the tote and was told by Mr. Ryan that the tote held wastes that were generated by an employee on 9/10/22. Mr. Ryan stated that the employee was no longer employed with WWU. At the time of the inspection, neither the tote nor any of the wastes in the tote were labeled with the words "Hazardous Waste" or marked with a hazard risk/indicator. According to	Citations:	Sections:

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Mr. Ryan, the tote containing the wastes had been in the paint booth room since 9/10/22 without a waste determination.		
Building: Psychology - Academic Instructional East	Area: Room 542	Sub-area: Fume hood
JJ1-OB-023		
While inspecting the contents of a fume hood in room 542, I saw two bins, each with multiple containers. There were a total of eight containers in the two bins that were labeled with the words "Waste." At the time of the inspection, none of the eight containers were labeled with either the words "Hazardous Waste" or marked with hazard risks/indicators. The containers that were labeled were identified as "Stain," "4% formalin," "Wright-Giemsa," "4% PFA," "DI Waste," and "Wright-Giemsa Buffer."	Citations:	Sections:
Building: Psychology - Academic Instructional East	Area: Room 532	Sub-area: Fume hood
JJ1-OB-024		
While inspecting the contents of the fume hood, I saw the following three containers that were not marked with a hazard risk/indicator: • One, 1-gal plastic container had a hazardous waste label, but no hazard risk/indicator. • One, pint/quart sized container had a hazardous waste label, but no hazard risk/indicator. • One, 1-gallon brown, glass reagent bottle had a hazardous waste label, but no hazard risk/indicator.	Citations:	Sections:
Building: Art Annex	Area: Room 51	Sub-area: Glaze Room
JJ1-OB-025		
While in the Glaze room, I saw an area beneath a countertop that was	Citations:	Sections:

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identified with a small marking as "EHS GLAZE WASTE." While inspecting this area, I saw two, 5-gallon containers and one 1/2-gallon container that held waste glaze. According to Mr. Carlton, waste glaze is allowed to dry out prior to disposal, and it's disposed of as toxic hazardous waste. At the time of the inspection, the three containers were not closed, not labeled with the words "Hazardous Waste," and not marked with hazard risks/indicators.		
Building: Fine Arts	Area: Room FI240	Sub-area: Painting Studio
JJ1-OB-027		
While inspecting the paint studio, we saw a small backroom that was being used as an SAA. After entering the SAA, we saw a 30-gallon container with an attached funnel. The container was marked with a hazardous waste label and a hazard risk/indicator. According to the container labeling, it was being used to accumulate waste paint related material. I pushed on the container to determine how full it was and determined that it held approximately 15 gallons of waste. At the time of the inspection, the container was not closed. The funnel lid was not latched, and the lid was not making a complete seal with the funnel. Mr. Carlton latched the funnel lid during the inspection, closing the container.	Citations:	Sections:
Building: Fine Arts	Area: Room FI240	Sub-area: Painting Studio
JJ1-OB-027		
The SAA container was next to a flammable storage cabinet. I inspected the flammable storage cabinet and its contents. Upon opening the cabinet, I saw a 5-gallon plastic container in the bottom of the cabinet as well as other various containers. The 5-gallon plastic	Citations:	Sections:

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container and other smaller containers contained unknown liquids, and none were marked or labeled.		
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Record: Manifests**JJ1-RR-001**

Ms. Thistle's email also included copies of invoices and disposal paperwork that included the following hazardous waste manifest:

- 200182545CLE

I reviewed the information on the manifest and saw that the special handling block indicated that the waste was flammable toxic pharmaceuticals however, the word "PHARMS"/"PHRMS" was not included in Item 13 of the manifest (EPA Form 8700-22).

Citations:**Sections:****Record: Inspections****JJ1-RR-002**

During the inspection I reviewed the last three years of weekly hazardous waste inspection logs for weekly inspections that were conducted in Room 141 of the Chemistry building, the waste shed outside of the Engineering Tech building, and the ISB CAA.

During my review, I saw that 10 weekly inspections were not conducted in Room 141 of the Chemistry building for the following weeks:

- 3/22-28/20
- 3/29/20-4/4/20
- 4/5-11/20
- 5/10-16/20
- 5/17-23/20
- 6/7-13/20
- 7/12-18/20
- 9/6-12/20
- 9/13-19/20

Citations:**Sections:**

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• 6/20-26/21 During my review, I saw that 18 weekly inspections were not conducted at the waste shed outside of the Engineering Tech building for the following weeks: • 12/15-21/19 • 12/22-28/19 • 1/12-18/20 • 3/22-28/20 • 3/29/20-4/4/20 • 4/5-4/11/20 • 5/17-23/20 • 6/7-13/20 • 7/12-18/20 • 8/9-15/20 • 9/6-12/20 • 9/13-19/20 • 12/13-19/20 • 6/20-26/21 • 12/19-25/21 • 12/26/21-1/1/22 • 2/13-19/22 When I asked about the weekly hazardous waste inspection logs for the ISB CAA, Mr. Carlton told us that no inspections had been conducted since it opened in June of 2022. Since June of 2022 the facility failed to conduct 19 weekly hazardous waste inspections. A total of 47 weekly hazardous waste inspections for the sites listed above were not conducted.		
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Record: Exception Reports**JJ1-RR-003**

During the inspection of the facility's hazardous waste manifests, manifest 017264524FLE was identified as not being received by the designated facility (TSDF) within 45 days. The manifest was signed by the designated facility 48 days after being shipped. The waste listed on the manifest was shipped on 8/11/22 and signed by the	Citations:	Sections:
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designated facility on 9/28/22. At the time of the inspection, the facility was unable to produce a copy of an exception report that had been submitted to EPA for the shipment.		
Record: Manifests		
JJ1-RR-004		
During the inspection of the facility's hazardous waste manifests, the facility was not in possession of the following eight manifests that had been signed by the designated facility: • 014224837FLE, dated 10/21/19 or 10/31/19 (Date on manifest was not legible) • 014224466FLE, dated 12/20/19 • 013299948FLE, dated 8/12/21 • 015728777FLE, dated 11/4/21 • 016449216FLE, dated 12/1/21 • 017194056FLE, dated 5/19/22 • 017194055FLE, dated 6/8/22 017264521FLE, dated 8/11/22	Citations:	Sections:
Record: Personnel Training		
JJ1-RR-005		
A review of the training documentation, for personnel that manage/handle hazardous waste, received from WWU on 11/2/22 indicated that there is no record of training for at least nine members of the WWU faculty. There was also no documented hazardous waste training for Mr. Gary Carlton, Safety Officer. Also, the following individuals conducted weekly hazardous waste inspections and there is no record of	Citations:	Sections:

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these personnel receiving any hazardous waste training: • Emmy Formiga • Kevin Nolasco • Meghan Burke • Dylen Cherry • Sally Vanx The individuals listed above conducted weekly hazardous waste inspections at the Chemistry Building CAA in room 141 and the Engineering Technology Building.		
Record: Personnel Training		
JJ1-RR-005		
There were also no records of any universal waste training or hazardous waste pharmaceuticals training for any facility personnel or faculty.	Citations:	Sections:

SECTION V – CLOSING CONFERENCE AND FOLLOW UP**Closing Conference**

At the conclusion of the inspection, I conducted a closing conference that was attended by those listed in the Attendees table, in Section I of this report. I thanked everyone for their time and cooperation during the inspection and began a review of the areas of concern (listed in Section III – Areas of Concern) that I observed during my inspection of the facility. I then explained the follow-up process that would take place once I finished the report. I explained they would receive a copy of the report as would a case officer. I told them the case officer would review the report to determine if any of my areas of concern are determined to be violations.

Prior to departing the facility, I requested a copy of the following information be sent to me following the inspection:

- Hazardous Waste Contingency Plan
- Annual Dangerous Waste Reports
- Training records for personnel managing hazardous waste
- Training Plan
- List of personnel that manage hazardous waste, including job titles, and job descriptions including required introductory and annual training

Following the inspection, Mr. Carlton emailed his facility's response to the areas of concern on 11/2/22. The documentation included photos of the corrective action and will be reviewed by an EPA Compliance Officer.

Follow Up

Building:	Area:	Sub-area:
JJ1-CC-NT		
Prior to departing the facility, I requested a copy of the following information be sent to me following the inspection: • Hazardous Waste Contingency Plan • Annual Dangerous Waste Reports • Training records for personnel managing hazardous waste • List of personnel that manage hazardous waste, including job titles, and job descriptions including required introductory and annual training At the time this report was written, the List of personnel that manage hazardous waste, including job titles, and job descriptions including required introductory and annual training and Annual Dangerous Waste Reports have not been received.		
Building: Chemistry	Area: Room 470	Sub-area: Research lab
JJ1-OB-006		
Asked for Room 470 fume hood SAA inventory with SDS's. At the time this report was written, this information has not been received.		
Building: Engineering Technology	Area: Polymer Materials Engineering (PME) paint booth	Sub-area:
JJ1-OB-022		
Prior to leaving the paint booth room, I asked Mr. Ryan for an inventory of the wastes in the tote, including how the waste will be managed and a Safety Data Sheet (SDS) for each waste. At the time this report was written, this information has not been received.		
Building: Fine Arts	Area: Room FI240	Sub-area: Painting Studio
JJ1-OB-027		
Prior to leaving the Fine Arts, Room FI240 SAA, I asked Mr. Carlton to send me an inventory of the flammable cabinet along with a determination of the contents. At the time this report was written, this information has not been received.		

SECTION VI – SAMPLING ACTIVITIES AND ANALYTICAL RESULTS - No sampling was conducted.**SECTION VII – LIST OF APPENDICES**

1. Photo Log
2. Document Log

APPENDIX 1: PHOTO LOG



[Title]	IMG_0266.jpg	
10/18/2022 03:38 PM	Photographer: Jon Jones	
Engineering Technology/Polymer Materials Engineering (PME) paint booth	No CBI	No PII
View of a plastic tote that contains waste that was generated by a previous employee on 9/10/22. The waste seen in the tote has not yet had a waste determination.		



[Title]	IMG_0267.jpg	
10/18/2022 03:38 PM	Photographer: Jon Jones	
Engineering Technology/Polymer Materials Engineering (PME) paint booth	No CBI	No PII
Another view of the plastic tote that contains waste that was generated by a previous employee on 9/10/22. The waste seen in the tote has not yet had a waste determination.		

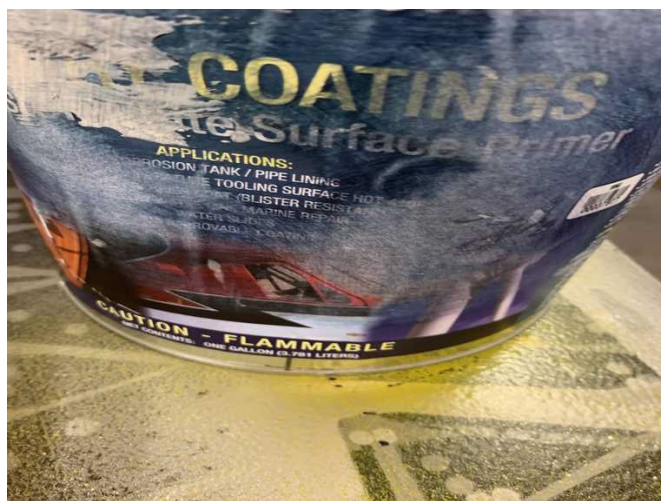


[Title]	IMG_0268.jpg	
10/18/2022 03:39 PM	Photographer: Jon Jones	
Engineering Technology/Polymer Materials Engineering (PME) paint booth	No CBI	No PII
Another view of the plastic tote that contains waste that was generated by a previous employee on 9/10/22. The waste seen in the tote has not yet had a waste determination.		

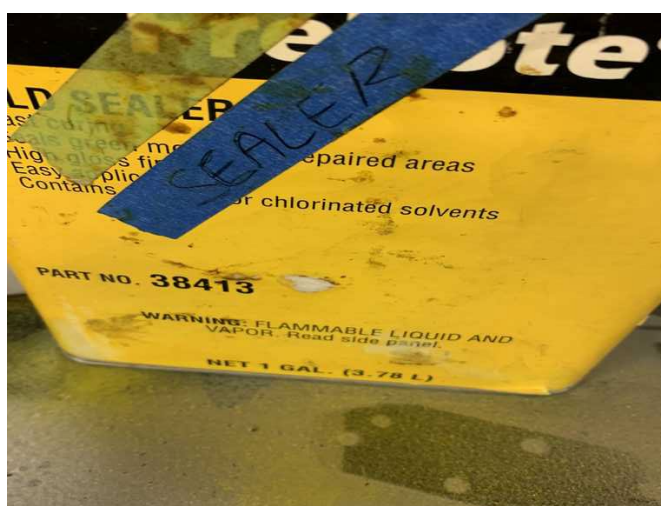


[Title]	IMG_0269.jpg	
10/18/2022 03:39 PM	Photographer: Jon Jones	
Engineering Technology/Polymer Materials Engineering (PME) paint booth	No CBI	No PII
View of the wastes that were in the plastic tote and require a waste determination.		

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[Title]	IMG_0270.jpg	
10/18/2022 03:39 PM	Photographer: Jon Jones	
Engineering Technology/Polymer Materials Engineering (PME) paint booth	No CBI	No PII
Close-up view of the labeling on the container showing the hazards and/or warnings.		



[Title]	IMG_0271.jpg	
10/18/2022 03:40 PM	Photographer: Jon Jones	
Engineering Technology/Polymer Materials Engineering (PME) paint booth	No CBI	No PII
Close-up view of the labeling on the container showing the hazards and/or warnings.		

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[Title]	IMG_0272.jpg	
10/18/2022 03:40 PM	Photographer: Jon Jones	
Engineering Technology/Polymer Materials Engineering (PME) paint booth	No CBI	No PII
Close-up view of the labeling on the container showing the hazards and/or warnings.		



[Title]	IMG_0273.jpg	
10/18/2022 03:40 PM	Photographer: Jon Jones	
Engineering Technology/Polymer Materials Engineering (PME) paint booth	No CBI	No PII
Close-up view of the labeling on the container showing the hazards and/or warnings.		

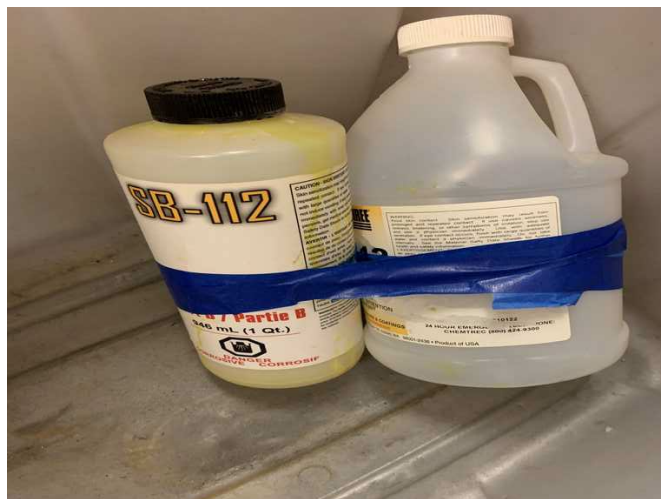
Inspection Date(s): October 18-19, 2022



[Title]	IMG_0274.jpg	
10/18/2022 03:40 PM	Photographer: Jon Jones	
Engineering Technology/Polymer Materials Engineering (PME) paint booth	No CBI	No PII
Close-up view of the labeling on the container showing the hazards and/or warnings.		



[Title]	IMG_0275.jpg	
10/18/2022 03:41 PM	Photographer: Jon Jones	
Engineering Technology/Polymer Materials Engineering (PME) paint booth	No CBI	No PII
Another view of the wastes that were in the plastic tote and require a waste determination.		



[Title]	IMG_0276.jpg	
10/18/2022 03:41 PM	Photographer: Jon Jones	
Engineering Technology/Polymer Materials Engineering (PME) paint booth	No CBI	No PII
Close-up view of the labeling on the container showing the hazards and/or warnings.		



[Title]	IMG_0277.jpg	
10/18/2022 03:41 PM	Photographer: Jon Jones	
Engineering Technology/Polymer Materials Engineering (PME) paint booth	No CBI	No PII
Close-up view of the labeling on the container showing the hazards and/or warnings.		



[Title]	IMG_0095.jpg	
10/18/2022 09:25 AM	Photographer: Jon Jones	
Health Clinic/Health Clinic Storeroom	No CBI	No PII
View of the container holding waste formalin		



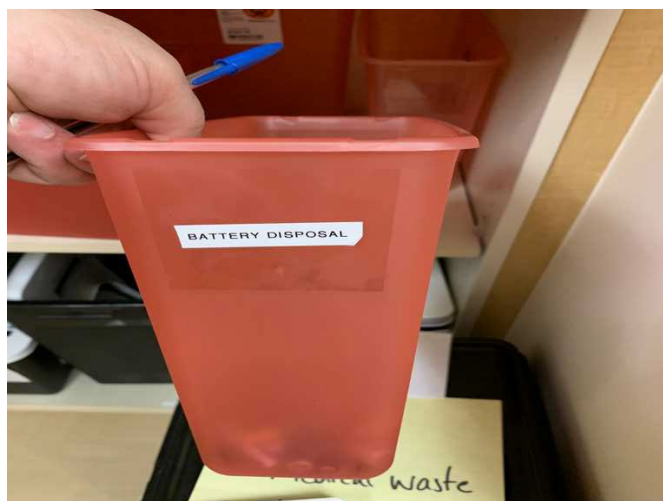
[Title]	IMG_0096.jpg	
10/18/2022 09:25 AM	Photographer: Jon Jones	
Health Clinic/Health Clinic Storeroom	No CBI	No PII
Another view of the same container seen in IMG_0095, that holds Waste formalin.		



[Title]	IMG_0097.jpg	
10/18/2022 09:25 AM	Photographer: Jon Jones	
Health Clinic/Health Clinic Storeroom	No CBI	No PII
View inside container seen in IMG_0095 and IMG_0096 showing the waste formalin.		



[Title]	IMG_0098.jpg	
10/18/2022 09:26 AM	Photographer: Jon Jones	
Health Clinic/Health Clinic Storeroom	No CBI	No PII
View of waste batteries in container. A waste nickel-cadmium battery can be seen at the bottom of the photo.		

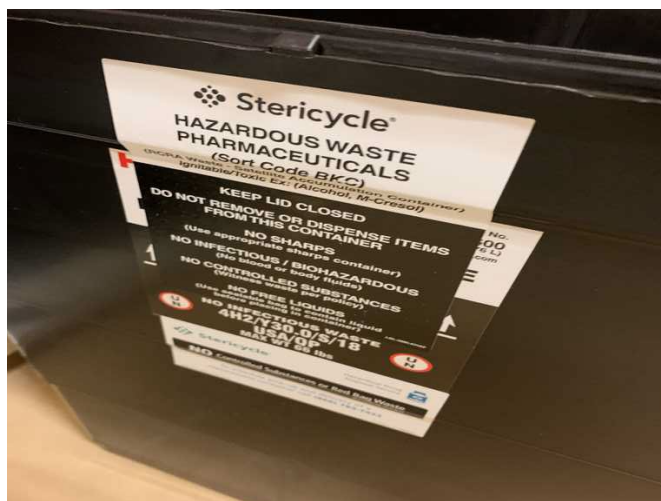


[Title]	IMG_0099.jpg	
10/18/2022 09:26 AM	Photographer: Jon Jones	
Health Clinic/Health Clinic Storeroom	No CBI	No PII
View of the waste battery container.		

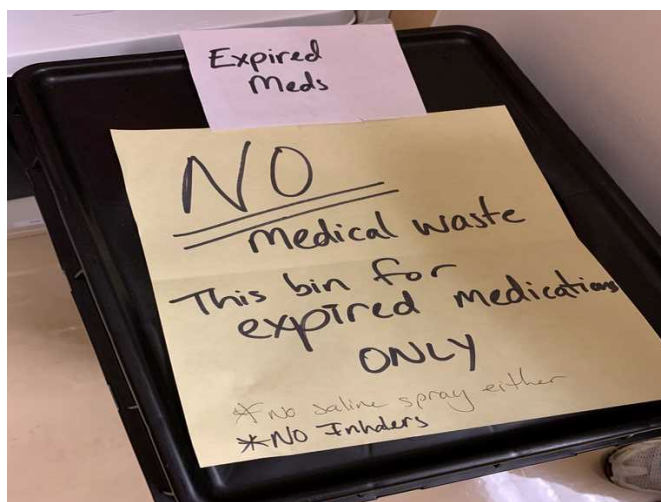


[Title]	IMG_0100.jpg	
10/18/2022 09:32 AM	Photographer: Jon Jones	
Health Clinic/Health Clinic Storeroom	No CBI	No PII
View of HWPharms inside waste container.		

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[Title]	IMG_0101.jpg	
10/18/2022 09:32 AM	Photographer: Jon Jones	
Health Clinic/Health Clinic Storeroom	No CBI	No PII
View of the labeling on the HWPharms container.		



[Title]	IMG_0102.jpg	
10/18/2022 09:32 AM	Photographer: Jon Jones	
Health Clinic/Health Clinic Storeroom	No CBI	No PII
View of labeling on top of HWPharms container.		

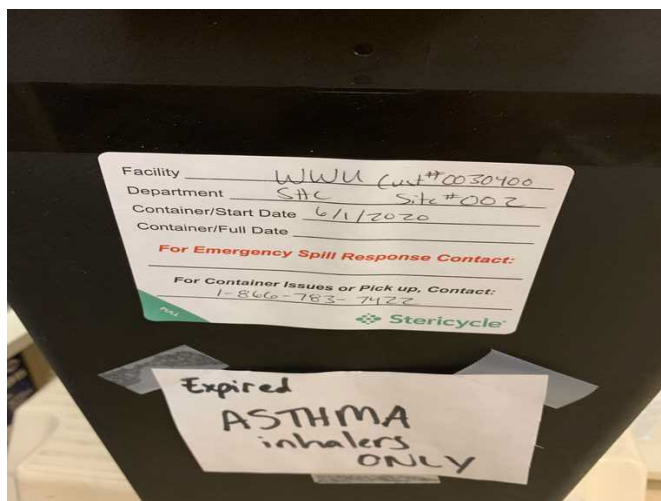


[Title]	IMG_0103.jpg	
10/18/2022 09:33 AM	Photographer: Jon Jones	
Health Clinic/Health Clinic Storeroom	No CBI	No PII
View of waste asthma inhalers inside container.		

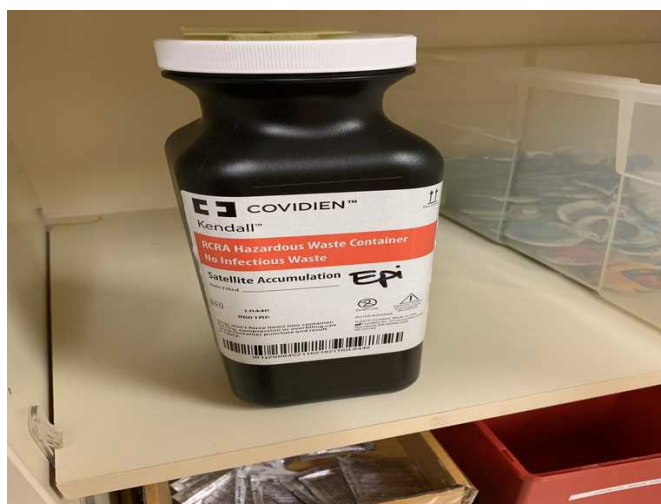


[Title]	IMG_0104.jpg	
10/18/2022 09:33 AM	Photographer: Jon Jones	
Health Clinic/Health Clinic Storeroom	No CBI	No PII
View of labeling on the waste asthma inhaler container.		

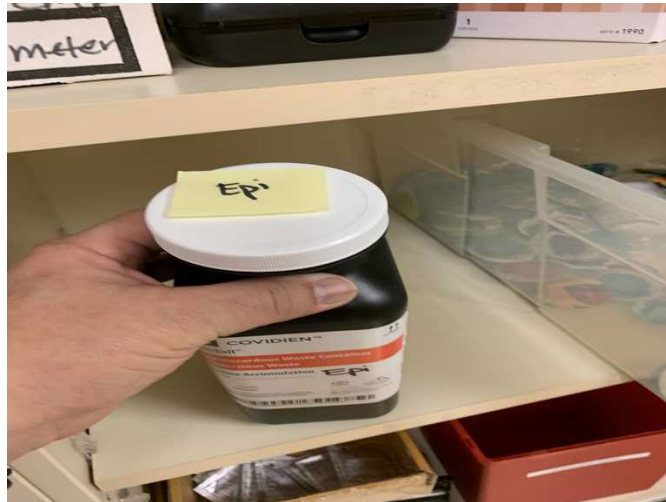
Inspection Date(s): October 18-19, 2022



[Title]	IMG_0105.jpg	
10/18/2022 09:34 AM	Photographer: Jon Jones	
Health Clinic/Health Clinic Storeroom	No CBI	No PII
View of additional labeling on the waste asthma inhaler container.		



[Title]	IMG_0106.jpg	
10/18/2022 09:40 AM	Photographer: Jon Jones	
Health Clinic/Health Clinic Storeroom	No CBI	No PII
View of the labeling on the waste Epi pen container.		



[Title]	IMG_0107.jpg	
10/18/2022 09:40 AM	Photographer: Jon Jones	
Health Clinic/Health Clinic Storeroom	No CBI	No PII
Another view of the labeling on the waste Epi pen container.		

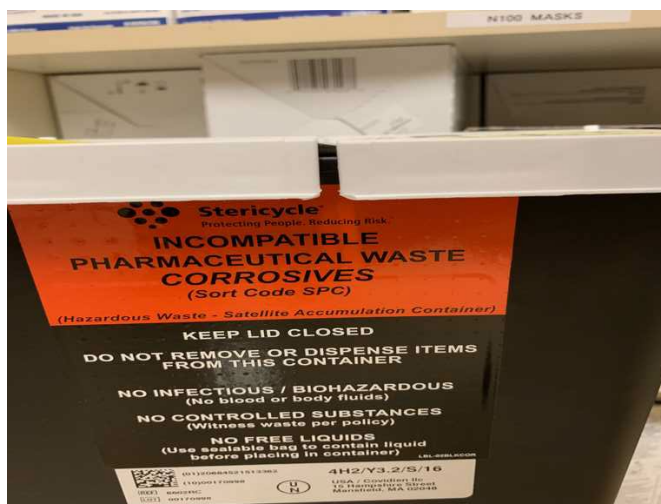


[Title]	IMG_0108.jpg	
10/18/2022 09:40 AM	Photographer: Jon Jones	
Health Clinic/Health Clinic Storeroom	No CBI	No PII
View of additional labeling on the waste Epi pen container.		

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[Title]	IMG_0109.jpg	
10/18/2022 09:40 AM	Photographer: Jon Jones	
Health Clinic/Health Clinic Storeroom	No CBI	No PII
View of labeling on the waste ammonia inhaler container.		



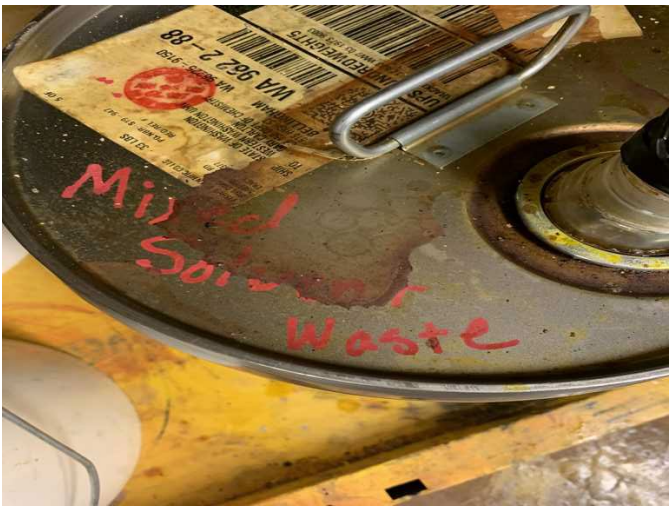
[Title]	IMG_0110.jpg	
10/18/2022 09:40 AM	Photographer: Jon Jones	
Health Clinic/Health Clinic Storeroom	No CBI	No PII
View of additional labeling on the waste ammonia inhaler container.		



[Title]	IMG_0111.jpg	
10/18/2022 09:41 AM	Photographer: Jon Jones	
Health Clinic/Health Clinic Storeroom	No CBI	No PII
View of the waste ammonia inhalers inside the container.		



[Title]	IMG_0263.jpg	
10/18/2022 03:35 PM	Photographer: Jon Jones	
Polymer Materials Engineering (PME) paint booth/Flammable cabinet	No CBI	No PII
Close-up view of the same container seen in IMG_0262.jpg. The waste container is not labeled with the words "Hazardous Waste." The container lid is also seen here, not making a complete seal to close the container.		



[Title]	IMG_0264.jpg	
10/18/2022 03:35 PM	Photographer: Jon Jones	
Polymer Materials Engineering (PME) paint booth/Flammable cabinet	No CBI	No PII
Close-up view of the top of the waste container, seen here marked with the words, "Mixed Solvent Waste." The container is not marked with a hazardous waste label. The container lid is also seen here, not making a complete seal to close the container.		



[Title]	IMG_0265.jpg	
10/18/2022 03:35 PM	Photographer: Jon Jones	
Polymer Materials Engineering (PME) paint booth/Flammable cabinet	No CBI	No PII
Another close-up view of the top of the waste container, seen here marked with the words, "Mixed Solvent Waste." The container is not marked with a hazardous waste label. The container lid is also seen here, not making a complete seal to close the container.		

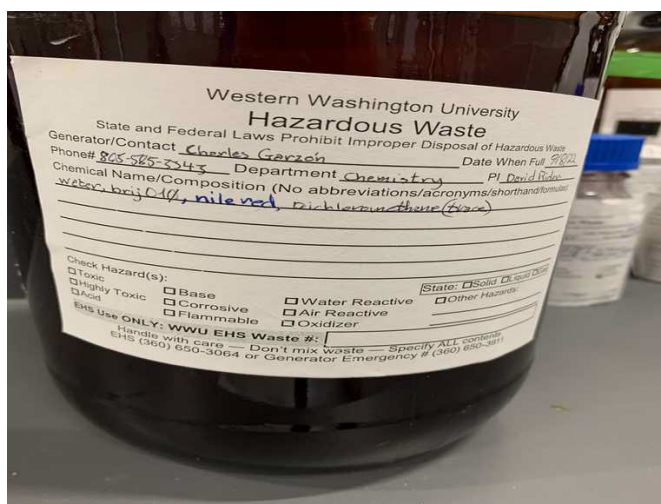


[Title]	IMG_0232.jpg	
10/18/2022 02:22 PM	Photographer: Jon Jones	
Room 119 Chemical Waste/Acid corrosive area	No CBI	No PII
View of the "Acid Corrosive Area" in the CAA.		

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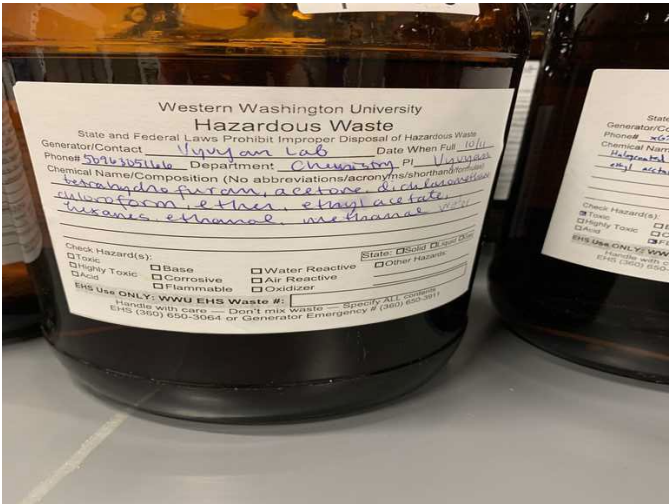
[Title]	IMG_0233.jpg	
10/18/2022 02:22 PM	Photographer: Jon Jones	
Room 119 Chemical Waste/Acid corrosive area	No CBI	No PII
View of a 1-gallon brown, glass container holding hazardous waste that is not marked with a hazard risk/indicator. Container is seen here in the front, on the left side in the photo.		



[Title]	IMG_0234.jpg	
10/18/2022 02:22 PM	Photographer: Jon Jones	
Room 119 Chemical Waste/Acid corrosive area	No CBI	No PII
Close-up view of the label on the container, showing that it is not marked with a hazard risk/indicator.		



[Title]	IMG_0235.jpg	
10/18/2022 02:25 PM	Photographer: Jon Jones	
Room 119 Chemical Waste/Halogenated flammable neutral area	No CBI	No PII
View of the "Halogenated Flammable Neutral Area" in the CAA. A waste container seen here in the front, second from the left, is not marked with a hazard risk/indicator.		



[Title]	IMG_0236.jpg	
10/18/2022 02:25 PM	Photographer: Jon Jones	
Room 119 Chemical Waste/Halogenated flammable neutral area	No CBI	No PII
Close-up view of the same container, seen in IMG_0235.jpg, showing that it is not marked with a hazard risk/indicator.		

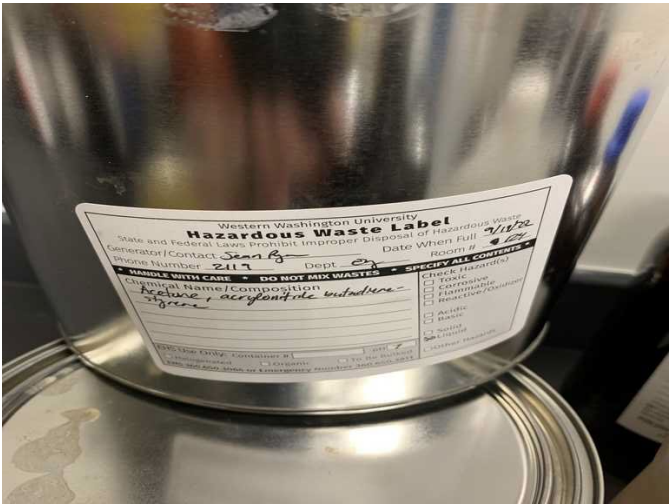


[Title]	IMG_0237.jpg	
10/18/2022 02:26 PM	Photographer: Jon Jones	
Room 119 Chemical Waste/Non-halogenated flammable neutral area	No CBI	No PII
View of the "Non-Halogenated Flammable Neutral Area" of the CAA. The 1-gallon, metal waste container seen here on the left, is not marked with a hazard risk/indicator.		



[Title]	IMG_0238.jpg	
10/18/2022 02:26 PM	Photographer: Jon Jones	
Room 119 Chemical Waste/Non-halogenated flammable neutral area	No CBI	No PII
Another view of the same area and the same container, seen in IMG_0237.jpg, showing that it is not marked with a hazard risk/indicator.		

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[Title]	IMG_0239.jpg	
10/18/2022 02:27 PM	Photographer: Jon Jones	
Room 119 Chemical Waste/Non-halogenated flammable neutral area	No CBI	No PII
Close-up view of the label on the 1-gallon, metal waste container showing that it is not marked with a hazard risk/indicator.		

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[Title]	IMG_0240.jpg	
10/18/2022 02:27 PM	Photographer: Jon Jones	
Room 119 Chemical Waste/Stand-up fume hood	No CBI	No PII
View of a 55-gallon hazardous waste container that is located just outside of a stand-up fume hood. The container is seen here labeled as "Halogenated Flammable Neutral Waste." The container is not labeled with the words "Hazardous Waste" or marked with a hazard risk/indicator.		

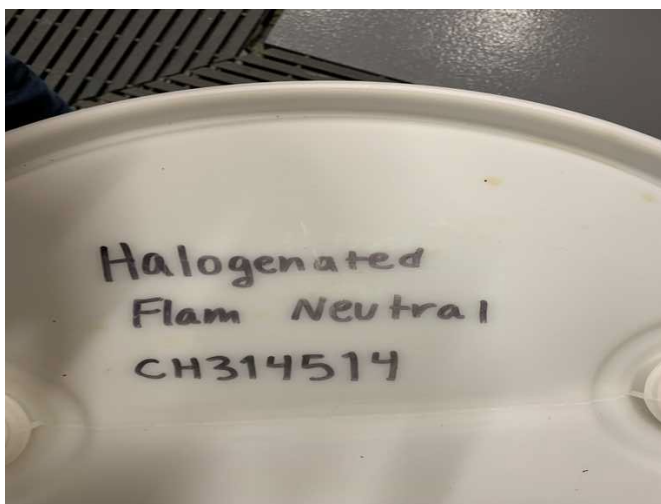


[Title]	IMG_0241.jpg	
10/18/2022 02:27 PM	Photographer: Jon Jones	
Room 119 Chemical Waste/Stand-up fume hood	No CBI	No PII
Another view of the same waste container, seen in IMG_0240.jpg, show here with no hazardous waste label or hazard risk/indicator.		

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[Title]	IMG_0242.jpg	
10/18/2022 02:27 PM	Photographer: Jon Jones	
Room 119 Chemical Waste/Stand-up fume hood	No CBI	No PII
Another view of the same waste container, seen in IMG_0240.jpg and IMG_0241.jpg, show here with no hazardous waste label or hazard risk/indicator.		



[Title]	IMG_0243.jpg	
10/18/2022 02:28 PM	Photographer: Jon Jones	
Room 119 Chemical Waste/Stand-up fume hood	No CBI	No PII
Close-up view of the top of the container, seen in IMG_0240.jpg, IMG_0241.jpg, and IMG_0242.jpg, shown here with no hazardous waste label or hazard risk/indicator.		



[Title]	IMG_0244.jpg	
10/18/2022 02:28 PM	Photographer: Jon Jones	
Room 119 Chemical Waste/Stand-up fume hood	No CBI	No PII
View of another 55-gallon hazardous waste container, seen here inside of the stand-up fume hood, that is labeled with the words, "Flam Acid Waste." The container is not marked with a hazardous waste label or a hazard risk/indicator.		



[Title]	IMG_0245.jpg	
10/18/2022 02:28 PM	Photographer: Jon Jones	
Room 119 Chemical Waste/Stand-up fume hood	No CBI	No PII
Another view of the same container, seen in IMG_0244.jpg, shown here with no hazardous waste label or hazard risk/indicator.		



[Title]	IMG_0246.jpg	
10/18/2022 02:28 PM	Photographer: Jon Jones	
Room 119 Chemical Waste/Stand-up fume hood	No CBI	No PII
Another view of the same container, seen in IMG_0244.jpg and IMG_0245.jpg, showing that it is not marked with a hazardous waste label or a hazard risk/indicator.		

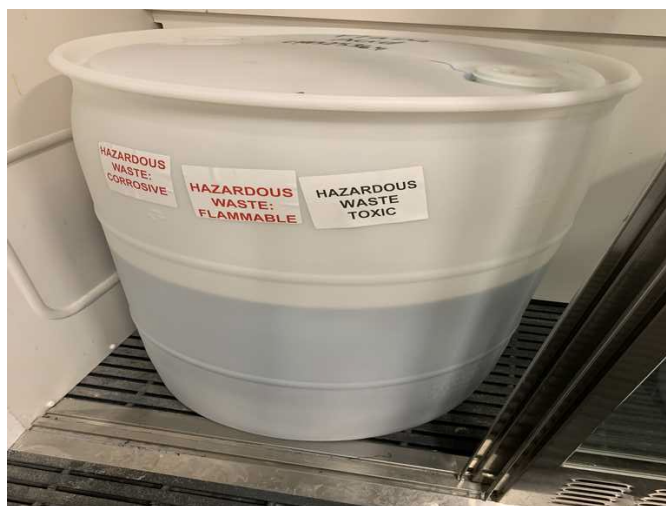


[Title]	IMG_0247.jpg	
10/18/2022 02:29 PM	Photographer: Jon Jones	
Room 119 Chemical Waste/Stand-up fume hood	No CBI	No PII
View of both 55-gallon waste containers, seen in the previous photos, after the first container was placed back into the fume hood and both containers were labeled/marked and closed.		

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[Title]	IMG_0248.jpg	
10/18/2022 02:30 PM	Photographer: Jon Jones	
Room 119 Chemical Waste/Stand-up fume hood	No CBI	No PII
View of the waste container after being labeled with the words, "Hazardous Waste" and marked with a hazard risk/indicator.		



[Title]	IMG_0249.jpg	
10/18/2022 02:30 PM	Photographer: Jon Jones	
Room 119 Chemical Waste/Stand-up fume hood	No CBI	No PII
View of the waste container after being labeled with the words, "Hazardous Waste" and marked with a hazard risk/indicator.		



[Title]	IMG_0250.jpg	
10/18/2022 02:32 PM	Photographer: Jon Jones	
Room 119 Chemical Waste/Stand-up fume hood	No CBI	No PII
View of the flammable acid waste container after being closed.		

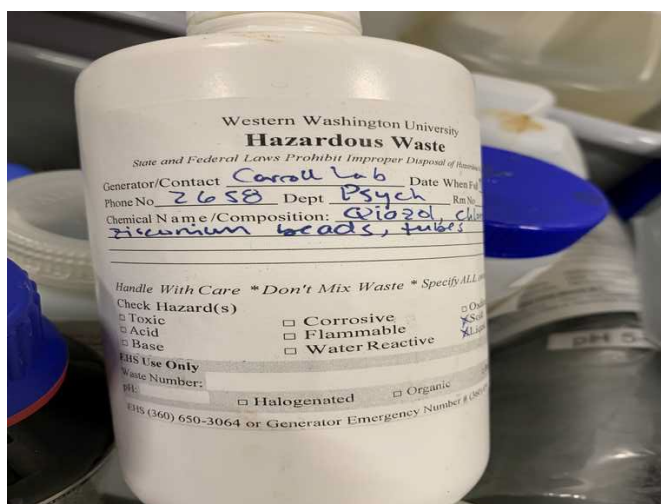


[Title]	IMG_0228.jpg	
10/18/2022 02:19 PM	Photographer: Jon Jones	
Room 119 Chemical Waste/Toxic Area	No CBI	No PII
View of the hazardous waste being accumulated in the "Toxic Area" of the CAA.		

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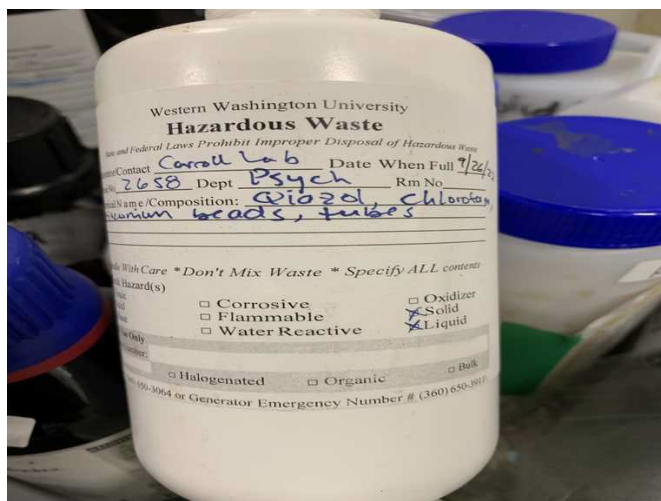


[Title]	IMG_0229.jpg	
10/18/2022 02:19 PM	Photographer: Jon Jones	
Room 119 Chemical Waste/Toxic Area	No CBI	No PII
View of a white, pint sized container of hazardous waste, seen here sticking up in the center bin on the table. The container is not marked with a hazard risk/indicator.		



[Title]	IMG_0230.jpg	
10/18/2022 02:19 PM	Photographer: Jon Jones	
Room 119 Chemical Waste/Toxic Area	No CBI	No PII
Close-up view of the waste container, showing that it is not marked with a hazard risk/indicator.		

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[Title]	IMG_0231.jpg	
10/18/2022 02:19 PM	Photographer: Jon Jones	
Room 119 Chemical Waste/Toxic Area	No CBI	No PII
Another view of the same waste container, seen in IMG_0230.jpg, showing that it is not marked with a hazard risk/indicator.		



[Title]	IMG_0208.jpg	
10/18/2022 01:53 PM	Photographer: Jon Jones	
Room 131A/Aerosol can pop room	No CBI	No PII
View of a floor size fume hood where facility personnel puncture waste aerosol cans.		



[Title]	IMG_0209.jpg	
10/18/2022 01:54 PM	Photographer: Jon Jones	
Room 131A/Aerosol can pop room	No CBI	No PII
View of the top of the waste container, showing the aerosol can popping device and filter attached to the container.		



[Title]	IMG_0210.jpg	
10/18/2022 01:54 PM	Photographer: Jon Jones	
Room 131A/Aerosol can pop room	No CBI	No PII
Another view of the floor size fume hood with the waste container used to accumulate residue from puncturing waste aerosol cans.		



[Title]	IMG_0215.jpg	
10/18/2022 01:56 PM	Photographer: Jon Jones	
Room 131A/Aerosol can pop room	No CBI	No PII
View of the hazardous waste label and hazard risk/indicator on the waste container.		



[Title]	IMG_0216.jpg	
10/18/2022 01:56 PM	Photographer: Jon Jones	
Room 131A/Aerosol can pop room	No CBI	No PII
View of the bottom of the container, seen here after the container was turned, showing waste aerosol residue coming from underneath the container.		



[Title]	IMG_0217.jpg	
10/18/2022 01:57 PM	Photographer: Jon Jones	
Room 131A/Aerosol can pop room	No CBI	No PII
Closer view of the waste residue running out from beneath the container.		



[Title]	IMG_0219.jpg	
10/18/2022 02:05 PM	Photographer: Jon Jones	
Room 131A/Aerosol can pop room	No CBI	No PII
View of a plastic bin on the counter, directly across from the floor size fume hood, that contains waste aerosol cans to be punctured. The waste aerosol cans are seen here without any hazardous waste labeling or hazard risk/indicators.		

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[Title]	IMG_0220.jpg	
10/18/2022 02:05 PM	Photographer: Jon Jones	
Room 131A/Aerosol can pop room	No CBI	No PII
View of the waste aerosol cans in the plastic bin.		

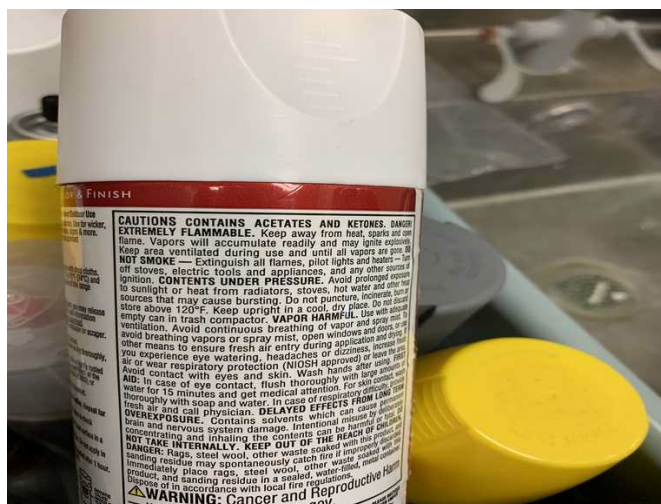


[Title]	IMG_0221.jpg	
10/18/2022 02:05 PM	Photographer: Jon Jones	
Room 131A/Aerosol can pop room	No CBI	No PII
View of an individual waste aerosol taken from the bin to show the hazard markings on the can.		

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[Title]		IMG_0222.jpg	
10/18/2022 02:05 PM		Photographer: Jon Jones	
Room 131A/Aerosol can pop room		No CBI	No PII
View of another waste aerosol can, taken from the bin, to show the hazard markings and warnings on the can.			



[Title]		IMG_0223.jpg	
10/18/2022 02:05 PM		Photographer: Jon Jones	
Room 131A/Aerosol can popping room		No CBI	No PII
View of the backside of the waste aerosol can, seen in IMG_0222.jpg, showing the hazard markings and warnings listed on the can.			

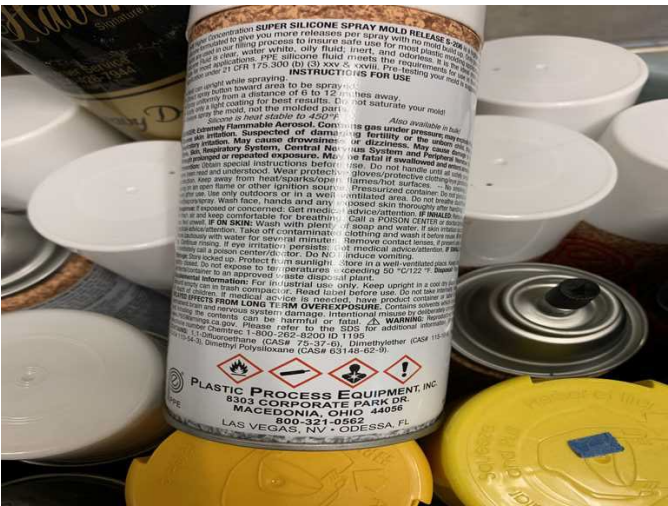
Inspection Date(s): October 18-19, 2022



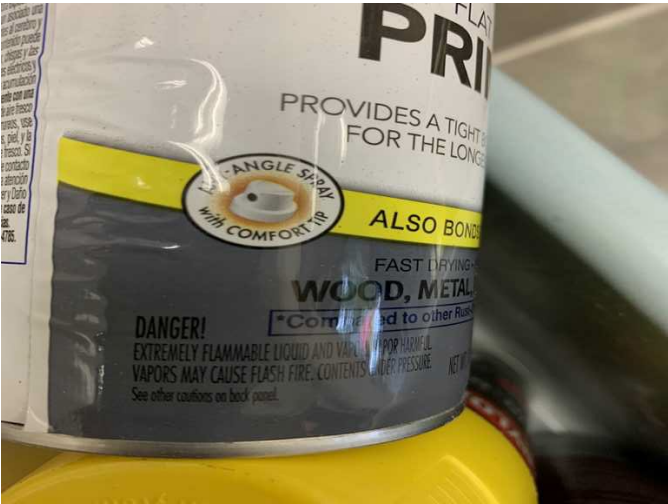
[Title]	IMG_0224.jpg	
10/18/2022 02:05 PM	Photographer: Jon Jones	
Room 131A/Aerosol can popping room	No CBI	No PII
View of another waste aerosol showing the hazard markings and warnings.		



[Title]	IMG_0225.jpg	
10/18/2022 02:06 PM	Photographer: Jon Jones	
Room 131A/Aerosol can popping room	No CBI	No PII
View of another waste aerosol showing the hazard markings and warnings.		



[Title]		IMG_0226.jpg	
10/18/2022 02:06 PM		Photographer: Jon Jones	
Room 131A/Aerosol can popping room		No CBI	No PII
View of another waste aerosol showing the hazard markings and warnings.			

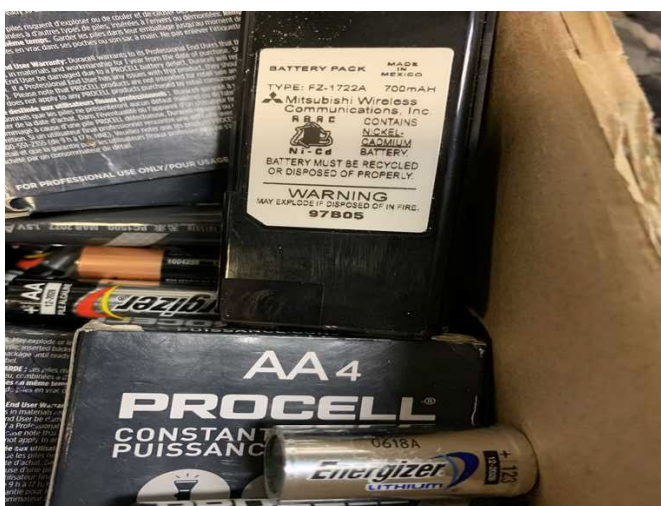


[Title]		IMG_0227.jpg	
10/18/2022 02:06 PM		Photographer: Jon Jones	
Room 131A/Aerosol can popping room		No CBI	No PII
View of another waste aerosol showing the hazard markings and warnings.			

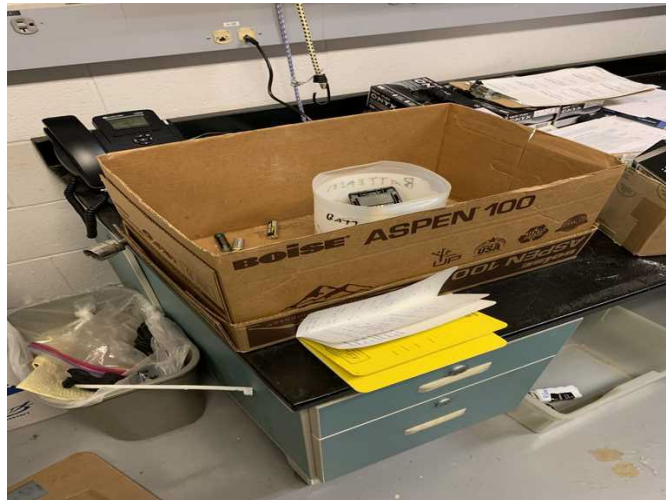
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[Title]	IMG_0114.jpg	
10/18/2022 10:25 AM	Photographer: Jon Jones	
Room 141/Universal Waste/Hazardous Waste accumulation area	No CBI	No PII
View of the unlabeled and undated box of waste batteries.		



[Title]	IMG_0115.jpg	
10/18/2022 10:25 AM	Photographer: Jon Jones	
Room 141/Universal Waste/Hazardous Waste accumulation area	No CBI	No PII
Close-up view of some of the waste batteries that were seen inside of the second box of waste batteries.		



[Title]	IMG_0116.jpg	
10/18/2022 10:25 AM	Photographer: Jon Jones	
Room 141/Universal Waste/Hazardous Waste accumulation area	No CBI	No PII
View of the third box of waste batteries, seen here unlabeled and undated.		



[Title]	IMG_0117.jpg	
10/18/2022 10:25 AM	Photographer: Jon Jones	
Room 141/Universal Waste/Hazardous Waste accumulation area	No CBI	No PII
Close-up view of the waste batteries seen in the third box.		

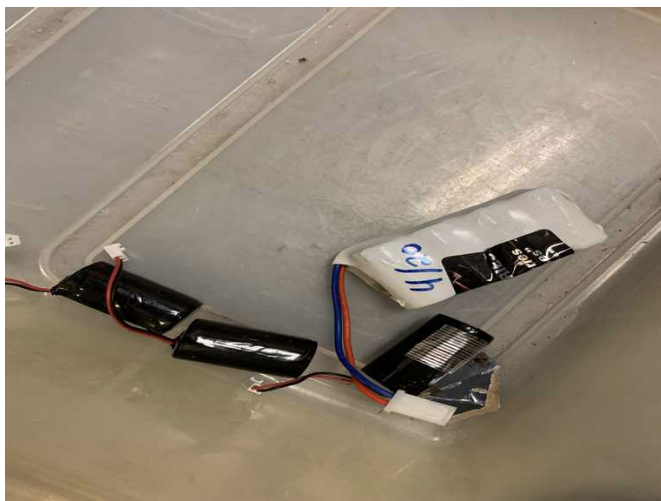
Inspection Date(s): October 18-19, 2022



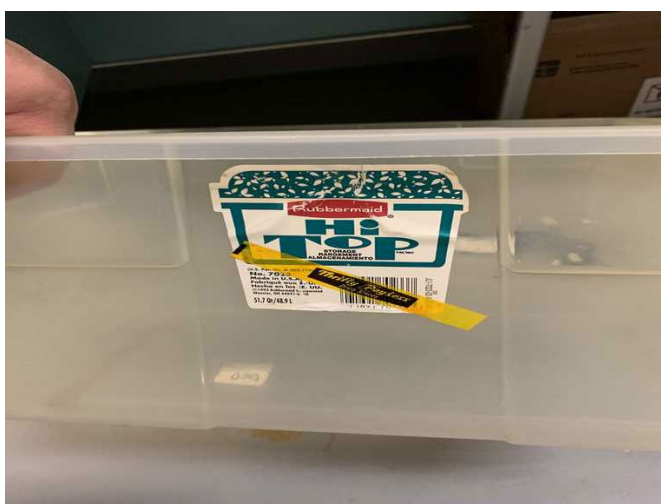
[Title]	IMG_0118.jpg	
10/18/2022 10:26 AM	Photographer: Jon Jones	
Room 141/Universal Waste/Hazardous Waste accumulation area	No CBI	No PII
Another close-up view of the waste batteries seen inside of the plastic container that was in the third box.		



[Title]	IMG_0119.jpg	
10/18/2022 10:26 AM	Photographer: Jon Jones	
Room 141/Universal Waste/Hazardous Waste accumulation area	No CBI	No PII
View of the plastic tub holding waste batteries that is seen here beneath the desk.		



[Title]	IMG_0120.jpg	
10/18/2022 10:26 AM	Photographer: Jon Jones	
Room 141/Universal Waste/Hazardous Waste accumulation area	No CBI	No PII
View of the waste batteries in the plastic tub.		



[Title]	IMG_0121.jpg	
10/18/2022 10:26 AM	Photographer: Jon Jones	
Room 141/Universal Waste/Hazardous Waste accumulation area	No CBI	No PII
View of the plastic tub of waste batteries, showing that it is unlabeled and undated.		

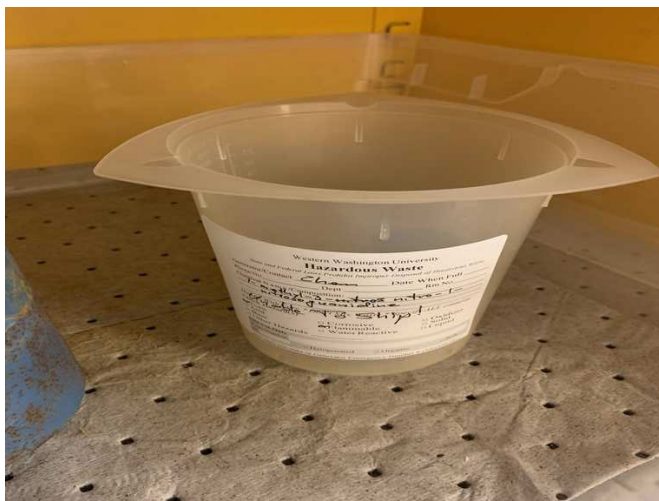


[Title]	IMG_0122.jpg	
10/18/2022 10:31 AM	Photographer: Jon Jones	
Room 141/Universal Waste/Hazardous Waste accumulation area	No CBI	No PII
View of the stacked flammable storage cabinets, the one on top seen here contains waste.		



[Title]	IMG_0123.jpg	
10/18/2022 10:31 AM	Photographer: Jon Jones	
Room 141/Universal Waste/Hazardous Waste accumulation area	No CBI	No PII
View of the interior of the flammable storage cabinet, showing accumulated waste in a plastic tub.		

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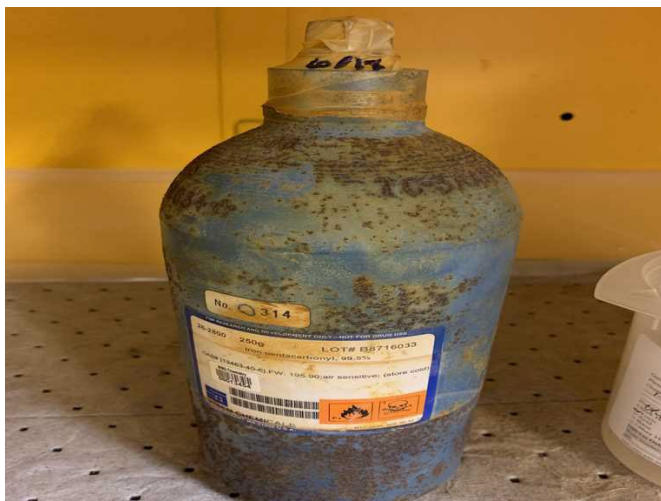


[Title]	IMG_0124.jpg	
10/18/2022 10:32 AM	Photographer: Jon Jones	
Room 141/Universal Waste/Hazardous Waste accumulation area	No CBI	No PII
View of a plastic beaker that holds a small waste container of 1-Methyl-3-nitro-1-nitrosoguanidine.		



[Title]	IMG_0125.jpg	
10/18/2022 10:32 AM	Photographer: Jon Jones	
Room 141/Universal Waste/Hazardous Waste accumulation area	No CBI	No PII
View looking down into the beaker that holds the waste 1-Methyl-3-nitro-1-nitrosoguanidine.		

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[Title]	IMG_0126.jpg	
10/18/2022 10:32 AM	Photographer: Jon Jones	
Room 141/Universal Waste/Hazardous Waste accumulation area	No CBI	No PII
View of the cylinder that contains waste Iron penta carbonyl 99.5%.		

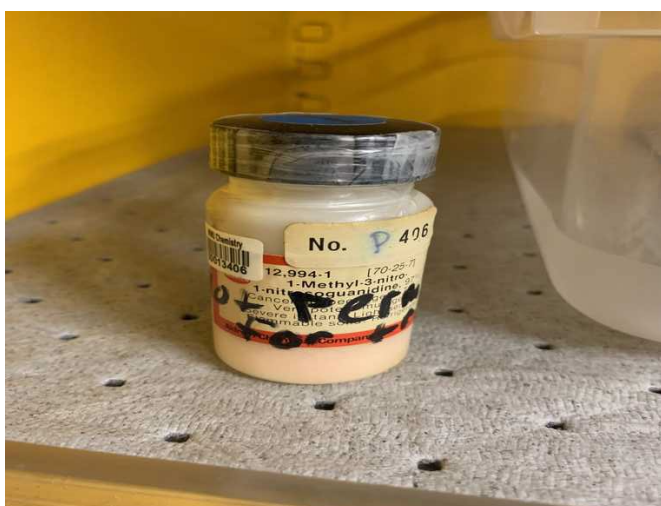


[Title]	IMG_0127.jpg	
10/18/2022 10:32 AM	Photographer: Jon Jones	
Room 141/Universal Waste/Hazardous Waste accumulation area	No CBI	No PII
Close-up view of the labeling on the waste container.		

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[Title]	IMG_0128.jpg	
10/18/2022 10:32 AM	Photographer: Jon Jones	
Room 141/Universal Waste/Hazardous Waste accumulation area	No CBI	No PII
View of the date, "6/18", seen marked on the neck of the cylinder.		



[Title]	IMG_0129.jpg	
10/18/2022 10:37 AM	Photographer: Jon Jones	
Room 141/Universal Waste/Hazardous Waste accumulation area	No CBI	No PII
View of the smaller waste container, showing the markings and writing on the label.		

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[Title]	IMG_0130.jpg	
10/18/2022 10:38 AM	Photographer: Jon Jones	
Room 141/Universal Waste/Hazardous Waste accumulation area	No CBI	No PII
Another close-up view of the waste container that holds 1-Mrthyl-3-nitro-1-nitrosoguanidine.		



[Title]	IMG_0131.jpg	
10/18/2022 10:38 AM	Photographer: Jon Jones	
Room 141/Universal Waste/Hazardous Waste accumulation area	No CBI	No PII
Another close-up view of the container markings.		

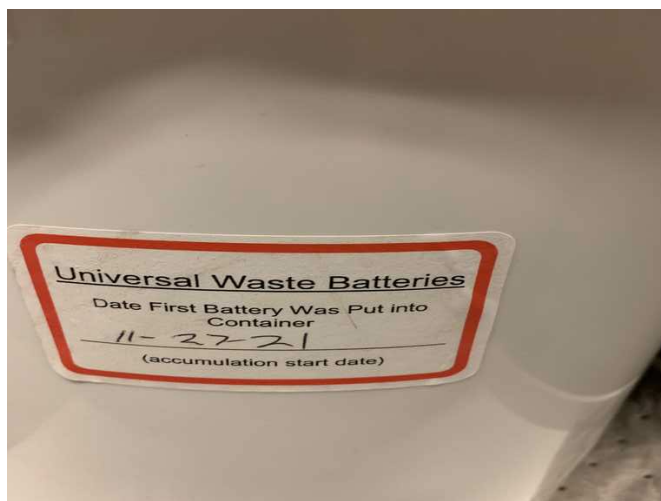


[Title]	IMG_0132.jpg	
10/18/2022 10:38 AM	Photographer: Jon Jones	
Room 141/Universal Waste/Hazardous Waste accumulation area	No CBI	No PII
Another view of the markings on the waste container.		



[Title]	IMG_0133.jpg	
10/18/2022 10:50 AM	Photographer: Jon Jones	
Room 141/Universal Waste/Hazardous Waste accumulation area	No CBI	No PII
View of a waste battery container inside one of three waste battery accumulation areas.		

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[Title]	IMG_0134.jpg	
10/18/2022 10:50 AM	Photographer: Jon Jones	
Room 141/Universal Waste/Hazardous Waste accumulation area	No CBI	No PII
Close-up view of the label on the waste battery storage container seen in IMG_0133.		



[Title]	IMG_0190.jpg	
10/18/2022 12:33 PM	Photographer: Jon Jones	
Room 150/Chemical Stock Room	No CBI	No PII
View of chemicals that were removed from decommissioned labs and have not been used since June of 2019.		



[Title]	IMG_0191.jpg	
10/18/2022 12:33 PM	Photographer: Jon Jones	
Room 150/Chemical Stock Room	No CBI	No PII
A view of additional chemicals that were from decommissioned labs and have not been used since June of 2019.		



[Title]	IMG_0192.jpg	
10/18/2022 12:33 PM	Photographer: Jon Jones	
Room 150/Chemical Stock Room	No CBI	No PII
A view of additional chemicals that were removed from decommissioned labs and have not been used since June of 2019.		



[Title]	IMG_0193.jpg	
10/18/2022 12:38 PM	Photographer: Jon Jones	
Room 150/Chemical Stock Room	No CBI	No PII
A view of additional chemicals that were removed from decommissioned labs and have not been used since June of 2019.		



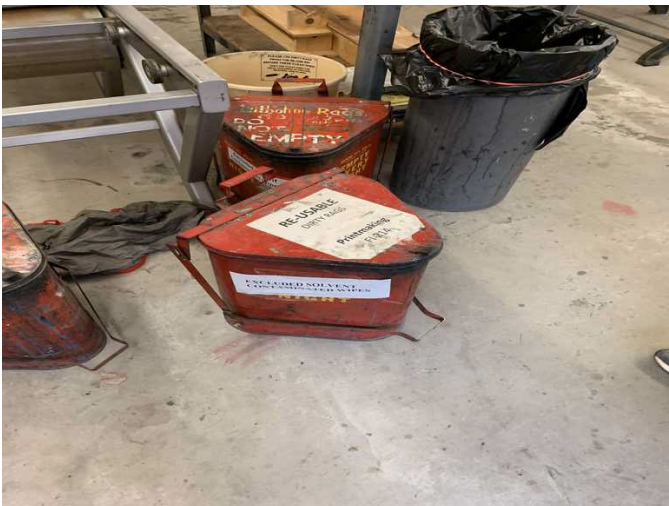
[Title]	IMG_0194.jpg	
10/18/2022 12:39 PM	Photographer: Jon Jones	
Room 150/Chemical Stock Room	No CBI	No PII
A view of additional chemicals that were removed from decommissioned labs and have not been used since June of 2019.		



[Title]	IMG_0195.jpg	
10/18/2022 12:53 PM	Photographer: Jon Jones	
Room 150/Chemical Stock Room	No CBI	No PII
A view of additional chemicals that were removed from decommissioned labs and have not been used since June of 2019.		



[Title]	IMG_0196.jpg	
10/18/2022 12:53 PM	Photographer: Jon Jones	
Room 150/Chemical Stock Room	No CBI	No PII
A view of additional chemicals that were removed from decommissioned labs and have not been used since June of 2019.		



[Title]	IMG_0321.jpg	
10/19/2022 09:23 AM	Photographer: Jon Jones	
Room 214/Printmaking Classroom	No CBI	No PII
View of a step-can, containing waste rags contaminated with waste ink. The container is seen here labeled as "Excluded Solvent Contaminated Wipes."		



[Title]	IMG_0204.jpg	
10/18/2022 01:41 PM	Photographer: Jon Jones	
Room 246/Biology stockroom	No CBI	No PII
View of a metal container, seen here on the right, inside a fume hood that contains waste lizard eggs in alcohol. The container is shown here without a hazardous waste label and hazard risk/indicator.		



[Title]	IMG_0205.jpg	
10/18/2022 01:42 PM	Photographer: Jon Jones	
Room 246/Biology stockroom	No CBI	No PII
View of the waste lizard eggs in alcohol.		



[Title]	IMG_0206.jpg	
10/18/2022 01:42 PM	Photographer: Jon Jones	
Room 246/Biology stockroom	No CBI	No PII
A close-up view of the label on the container that holds the waste lizard eggs in alcohol, showing that it is not labeled as hazardous waste and has no hazard risk/indicator.		

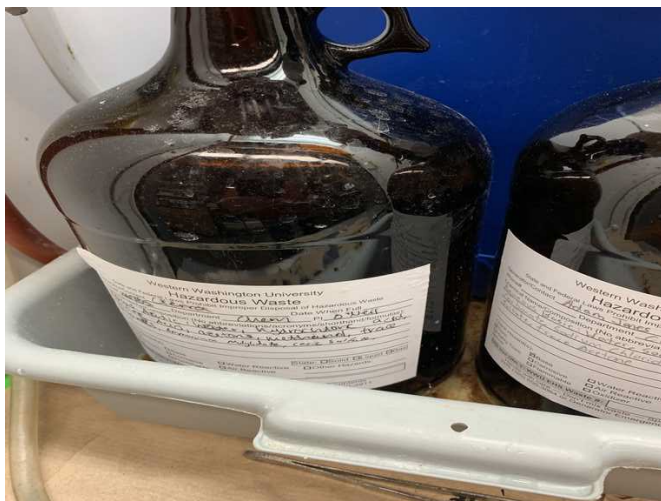


[Title]	IMG_0135.jpg	
10/18/2022 11:00 AM	Photographer: Jon Jones	
Room 252/Research lab	No CBI	No PII
View of gray tub inside of a fume hood that holds two 4-liter glass waste containers and a 5-gallon blue poly waste container.		

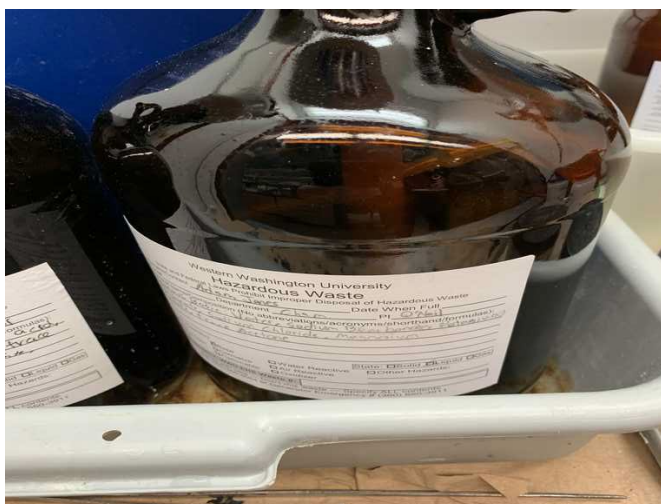


[Title]	IMG_0136.jpg	
10/18/2022 11:00 AM	Photographer: Jon Jones	
Room 252/Research lab	No CBI	No PII
Another view of the waste containers, seen in IMG_0135. All three containers seen in this photo are not closed and the two glass waste containers are incompatible wastes.		

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[Title]	IMG_0137.jpg	
10/18/2022 11:00 AM	Photographer: Jon Jones	
Room 252/Research lab	No CBI	No PII
Close-up view of the two glass waste containers in the gray tub. The container on the left is seen here marked as containing waste acid and has no hazard risk/indicator label.		

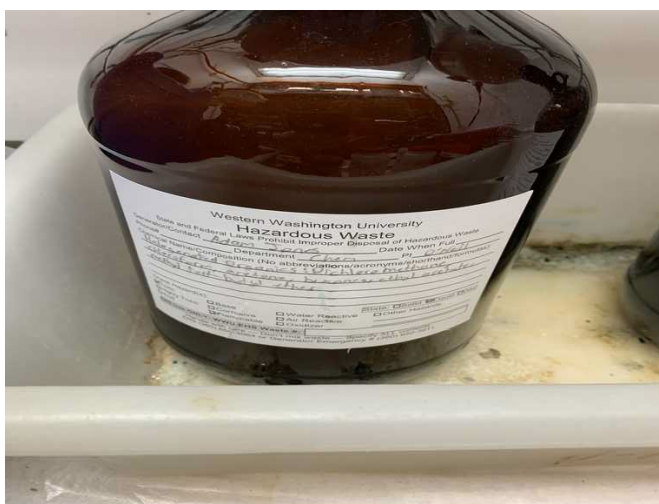


[Title]	IMG_0138.jpg	
10/18/2022 11:00 AM	Photographer: Jon Jones	
Room 252/Research lab	No CBI	No PII
Close-up view of the other glass waste container marked as containing basic waste.		

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[Title]	IMG_0139.jpg	
10/18/2022 11:01 AM	Photographer: Jon Jones	
Room 252/Research lab	No CBI	No PII
View of the other two glass waste containers in the white tub that are not closed.		

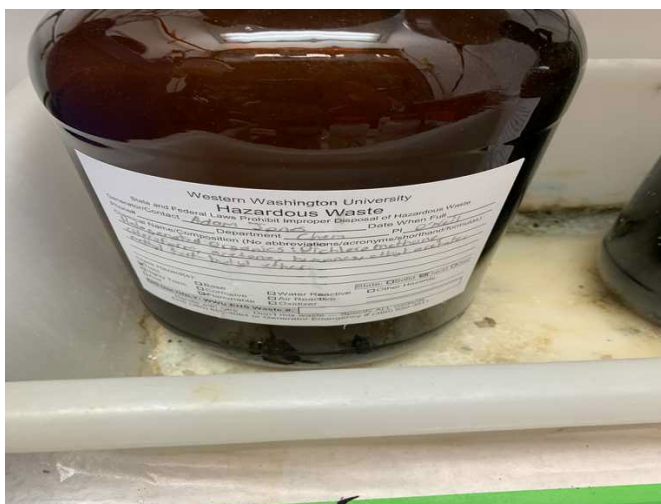


[Title]	IMG_0140.jpg	
10/18/2022 11:01 AM	Photographer: Jon Jones	
Room 252/Research lab	No CBI	No PII
View of the label on the waste container seen on the left in IMG_0139.		

Inspection Date(s): October 18-19, 2022

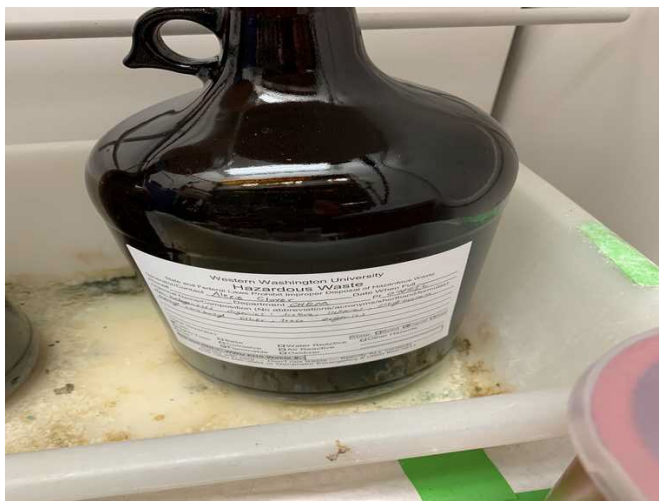


[Title]	IMG_0141.jpg	
10/18/2022 11:01 AM	Photographer: Jon Jones	
Room 252/Research lab	No CBI	No PII
Close-up view of the funnel lid, showing that it is not making a complete seal with the containers funnel.		

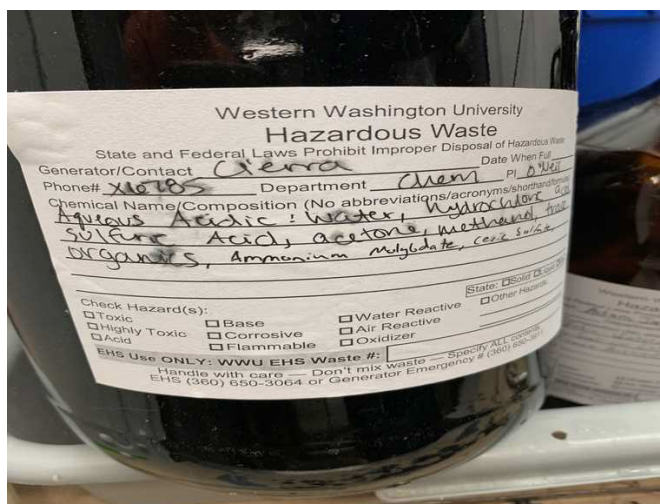


[Title]	IMG_0143.jpg	
10/18/2022 11:02 AM	Photographer: Jon Jones	
Room 252/Research lab	No CBI	No PII
Close-up view of the label on the waste container that is on the left side of the white tub.		

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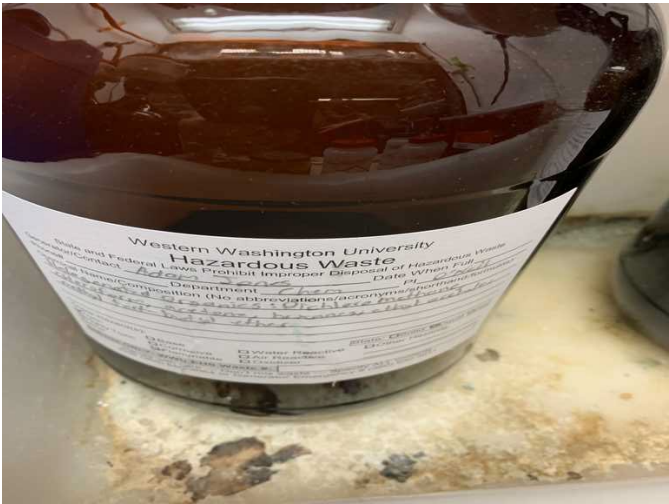
[Title]	IMG_0144.jpg	
10/18/2022 11:02 AM	Photographer: Jon Jones	
Room 252/Research lab	No CBI	No PII
Close-up view of the label on the waste container seen on the right side of the white tub.		



[Title]	IMG_0145.jpg	
10/18/2022 11:04 AM	Photographer: Jon Jones	
Room 252/Research lab	No CBI	No PII
Close-up view of the waste container label for the container that was on the front left side of the gray tub.		

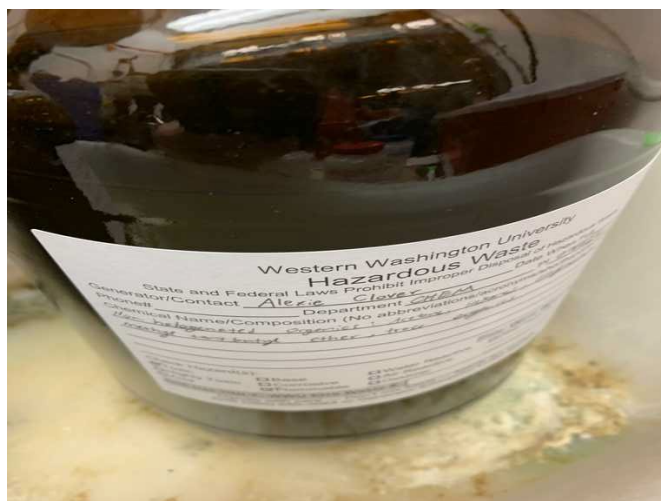


[Title]	IMG_0146.jpg	
10/18/2022 11:05 AM	Photographer: Jon Jones	
Room 252/Research lab	No CBI	No PII
View of the two glass waste containers in the white tub and shown here not closed.		



[Title]	IMG_0147.jpg	
10/18/2022 11:05 AM	Photographer: Jon Jones	
Room 252/Research lab	No CBI	No PII
Close-up view of the label on the waste container seen on the left in the white tub.		

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[Title]	IMG_0148.jpg	
10/18/2022 11:05 AM	Photographer: Jon Jones	
Room 252/Research lab	No CBI	No PII
Close-up view of the label on the waste container seen on the right side of the white tub.		



[Title]	IMG_0201.jpg	
10/18/2022 01:36 PM	Photographer: Jon Jones	
Room 364/Research lab	No CBI	No PII
View of pint size waste container that is not marked with a hazard risk/indicator.		



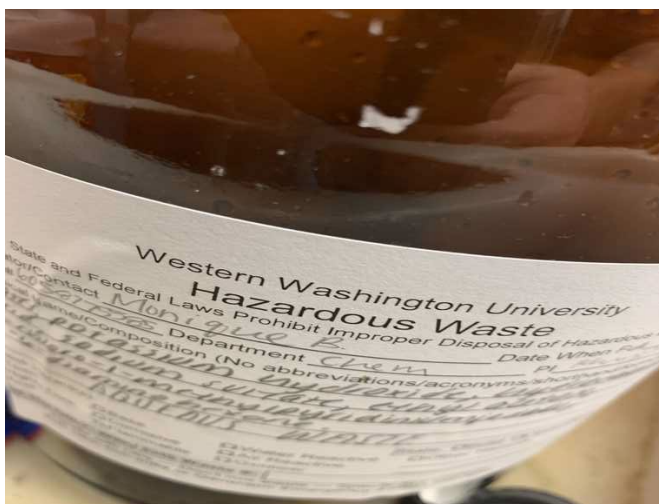
[Title]	IMG_0202.jpg	
10/18/2022 01:36 PM	Photographer: Jon Jones	
Room 364/Research lab	No CBI	No PII
Another view of the same container, seen in IMG_0201.jpg, seen here at the top right corner of the bin.		



[Title]	IMG_0156.jpg	
10/18/2022 11:44 AM	Photographer: Jon Jones	
Room 370/Research lab	No CBI	No PII
View of the 4-liter waste container that is not marked with a hazard risk/indicator.		



[Title]	IMG_0157.jpg	
10/18/2022 11:44 AM	Photographer: Jon Jones	
Room 370/Research lab	No CBI	No PII
View of two, 4-liter waste containers with attached funnels. The container in the back and on the right is not closed.		



[Title]	IMG_0158.jpg	
10/18/2022 11:44 AM	Photographer: Jon Jones	
Room 370/Research lab	No CBI	No PII
Close-up view of the label on the waste container that is not marked with a hazard risk/indicator.		



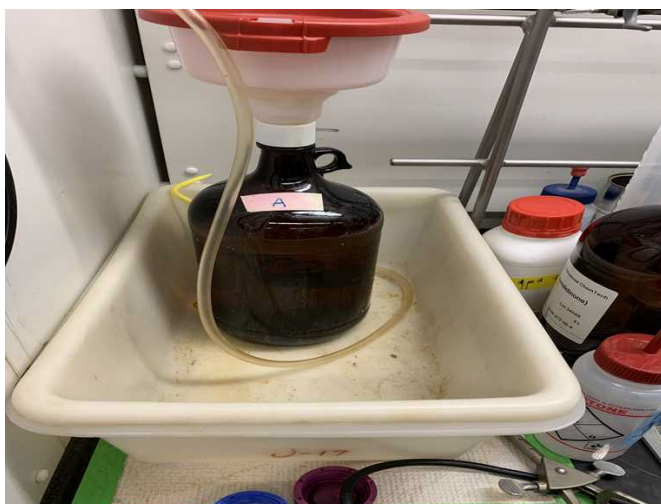
[Title]		IMG_0159.jpg	
10/18/2022 11:44 AM		Photographer: Jon Jones	
Room 370/Research lab		No CBI	No PII
Another view of the waste container in the back and to the right that is not closed.			



[Title]		IMG_0160.jpg	
10/18/2022 11:45 AM		Photographer: Jon Jones	
Room 370/Research lab		No CBI	No PII
View of the lid on the container in the rear of the plastic tub marked G-29, shown here not closed.			



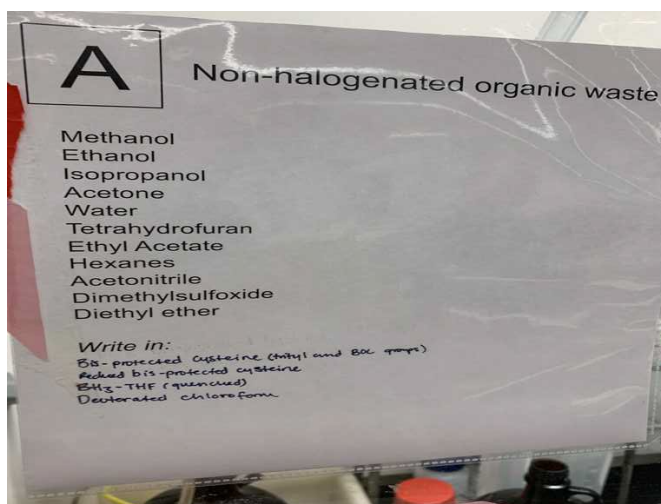
[Title]	IMG_0161.jpg	
10/18/2022 11:45 AM	Photographer: Jon Jones	
Room 370/Research lab	No CBI	No PII
View of the lid on the container seen in the tub on the far right, showing that the container is not closed.		



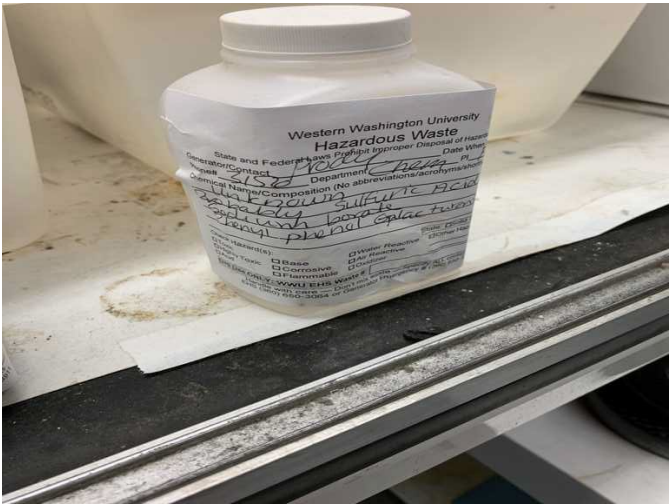
[Title]	IMG_0181.jpg	
10/18/2022 12:13 PM	Photographer: Jon Jones	
Room 410/Research lab	No CBI	No PII
View of a 1-gallon brown, glass waste container labeled as "A," and seen here without a hazardous waste label and hazard risk/indicator.		



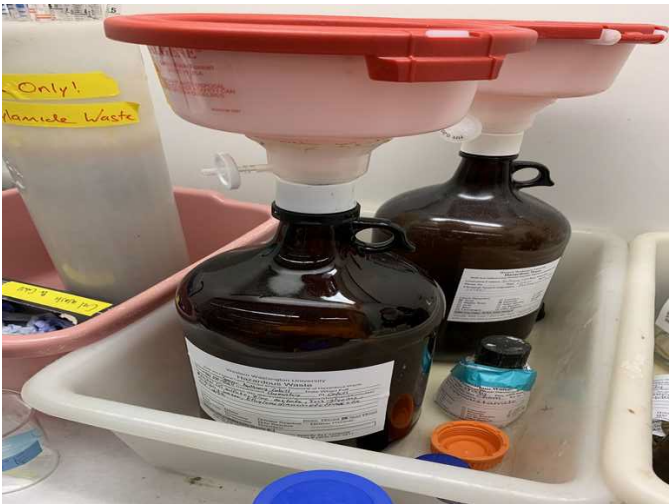
[Title]	IMG_0182.jpg	
10/18/2022 12:14 PM	Photographer: Jon Jones	
Room 410/Research lab	No CBI	No PII
Another view of the same waste container, seen in IMG_181.jpg, shown here without a hazardous waste label and hazard risk/indicator.		



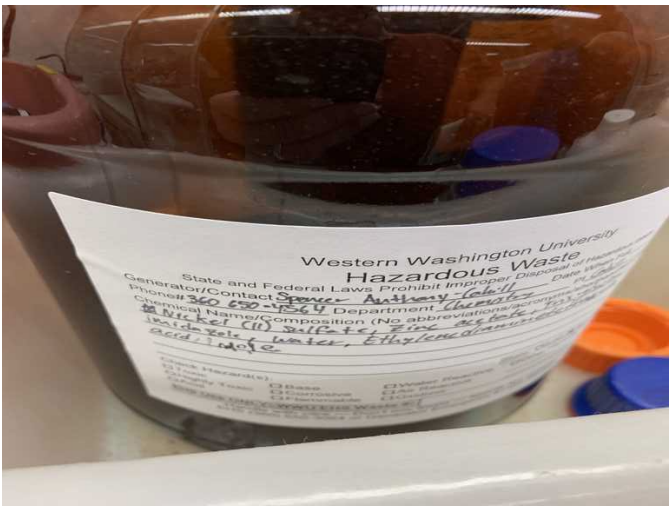
[Title]	IMG_0183.jpg	
10/18/2022 12:14 PM	Photographer: Jon Jones	
Room 410/Research lab	No CBI	No PII
View of a list, posted on the outside of the fume hood, that contains waste chemicals that are inside the waste container identified as "A."		



[Title]	IMG_0184.jpg	
10/18/2022 12:18 PM	Photographer: Jon Jones	
Room 412/Research lab	No CBI	No PII
View of a pint size waste container, marked as an unknown, that is labeled as hazardous waste but not marked with a hazard risk/indicator.		



[Title]	IMG_0185.jpg	
10/18/2022 12:19 PM	Photographer: Jon Jones	
Room 412/Research lab	No CBI	No PII
View of a 1-gallon brown, glass waste container, seen here in the front of the white bin, that is not marked with a hazard risk/indicator.		



[Title]	IMG_0186.jpg	
10/18/2022 12:19 PM	Photographer: Jon Jones	
Room 412/Research lab	No CBI	No PII
Close-up view of the label, showing that the hazard risk/indicator is not marked.		



[Title]	IMG_0187.jpg	
10/18/2022 12:19 PM	Photographer: Jon Jones	
Room 412/Research lab	No CBI	No PII
View of a small brown bottle, marked with green tape, that contains an unknown waste requiring a waste determination.		



[Title]	IMG_0188.jpg	
10/18/2022 12:21 PM	Photographer: Jon Jones	
Room 412/Research lab	No CBI	No PII
View of the markings on the bin (NSF) that contains the 1-gallon waste container, seen in the front of the bin, missing the hazard risk/indicator.		



[Title]	IMG_0197.jpg	
10/18/2022 01:17 PM	Photographer: Jon Jones	
Room 436/Research lab	No CBI	No PII
View of a waste container that contains PPE contaminated with ethidium bromide. The container is seen here labeled as hazardous waste, marked with a hazard risk/indicator, but not closed.		

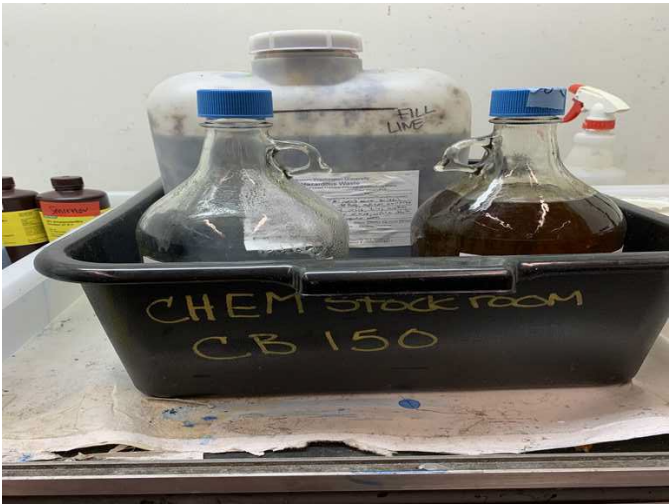
Inspection Date(s): October 18-19, 2022



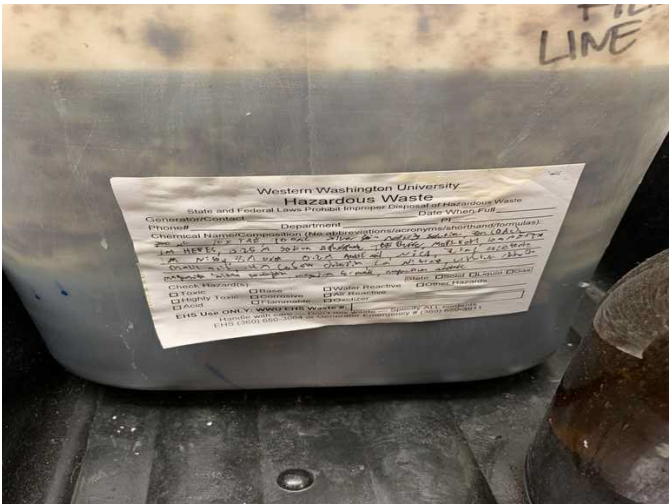
[Title]	IMG_0198.jpg	
10/18/2022 01:17 PM	Photographer: Jon Jones	
Room 436/Research lab	No CBI	No PII
Close-up view of the label and lid not making a complete seal with the container, showing that the container is not closed.		



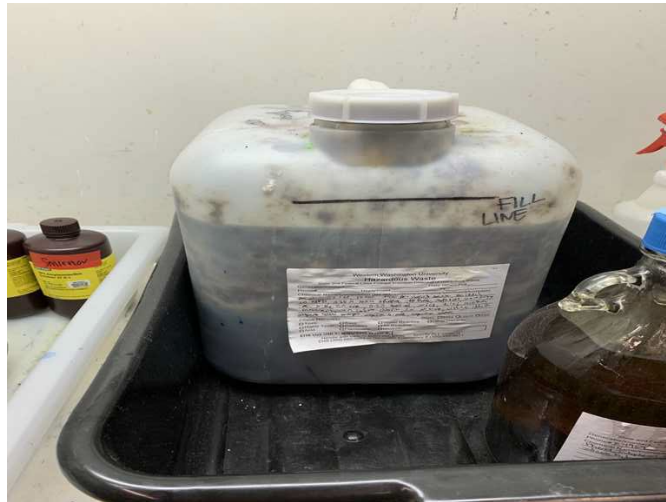
[Title]	IMG_0199.jpg	
10/18/2022 01:17 PM	Photographer: Jon Jones	
Room 436/Research lab	No CBI	No PII
Another view of the same waste container, seen in IMG_197.jpg, showing that it is not closed.		



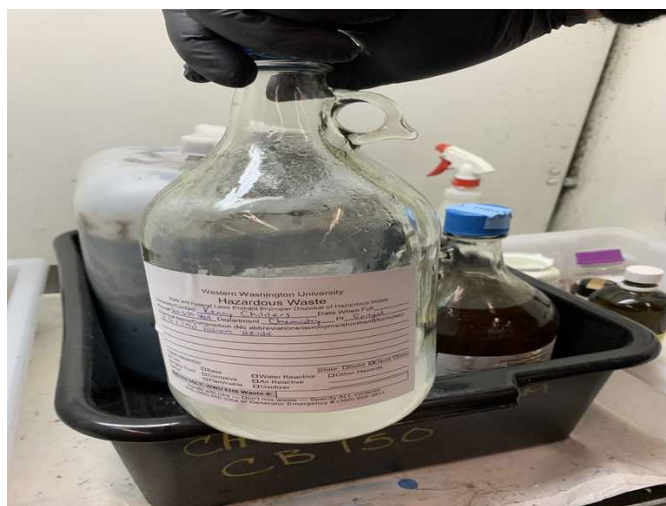
[Title]	IMG_0170.jpg	
10/18/2022 12:03 PM	Photographer: Jon Jones	
Room 470/Research lab	No CBI	No PII
View of a waste container, seen here in the front of the blue tub, without a hazard risk/indicator.		



[Title]	IMG_0171.jpg	
10/18/2022 12:03 PM	Photographer: Jon Jones	
Room 470/Research lab	No CBI	No PII
Close-up view of the label on the container seen in IMG_170.jpg, showing that it is not marked with a hazard risk/indicator.		

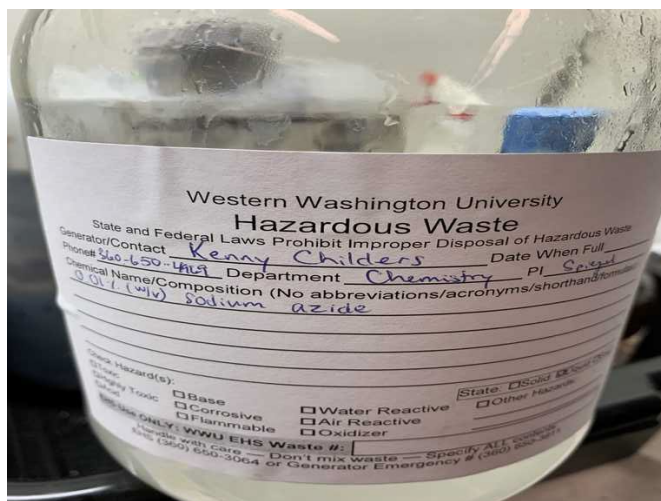


[Title]	IMG_0172.jpg	
10/18/2022 12:03 PM	Photographer: Jon Jones	
Room 470/Research lab	No CBI	No PII
View of the same waste container, seen in IMG_170.jpg and IMG_0171.jpg, showing that it is not marked with a hazard risk/indicator.		

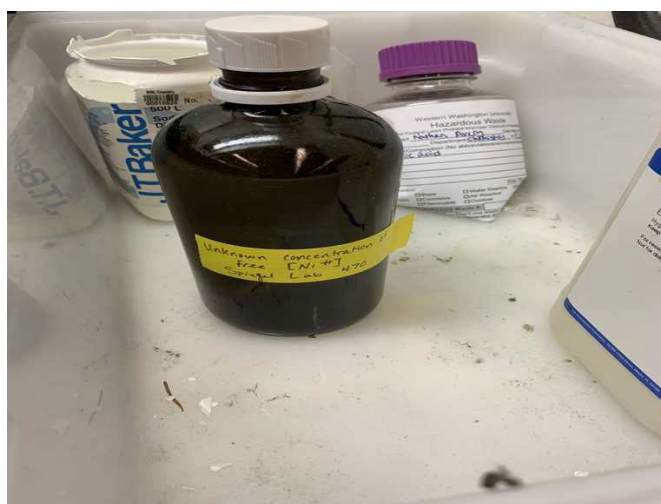


[Title]	IMG_0173.jpg	
10/18/2022 12:03 PM	Photographer: Jon Jones	
Room 470/Research lab	No CBI	No PII
View of 1-gallon, glass waste container that is not marked with a hazard risk/indicator.		

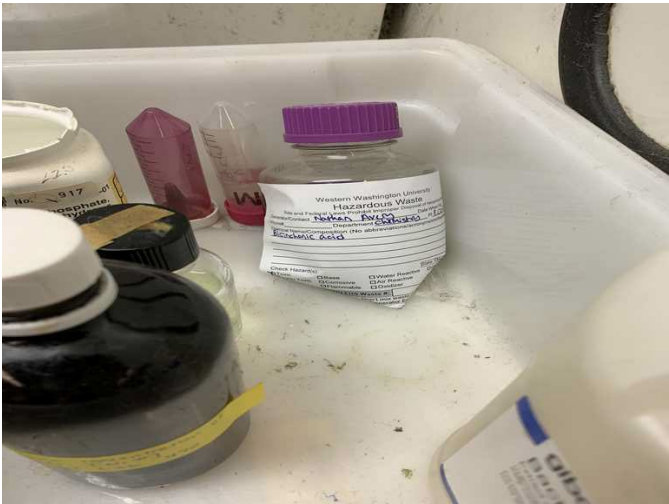
Inspection Date(s): October 18-19, 2022



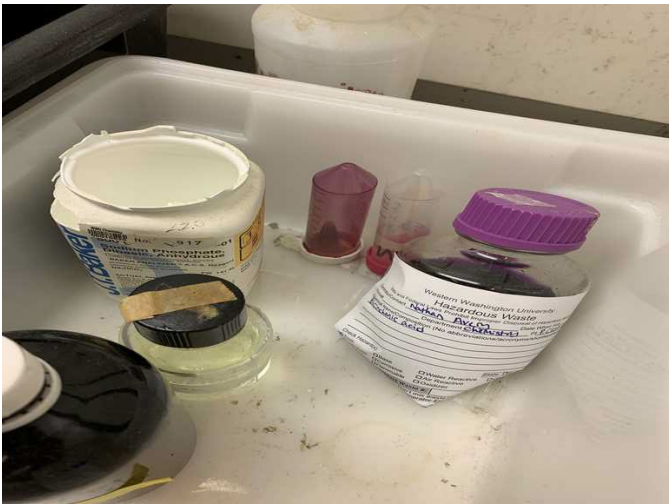
[Title]	IMG_0174.jpg	
10/18/2022 12:04 PM	Photographer: Jon Jones	
Room 470/Research lab	No CBI	No PII
Close-up view of the label on the waste container seen in IMG_173.jpg, showing that it is not marked with a hazard risk/indicator.		



[Title]	IMG_0175.jpg	
10/18/2022 12:04 PM	Photographer: Jon Jones	
Room 470/Research lab	No CBI	No PII
View of a brown, glass bottle that is labeled as, "Unknown Concentration of Free [Ni #]," requiring a waste determination.		



[Title]	IMG_0176.jpg	
10/18/2022 12:04 PM	Photographer: Jon Jones	
Room 470/Research lab	No CBI	No PII
View of clear glass container that has approximately four ounces of an unknown liquid and two vials in the background that contain unknowns and require a waste determination.		



[Title]	IMG_0178.jpg	
10/18/2022 12:04 PM	Photographer: Jon Jones	
Room 470/Research lab	No CBI	No PII
Another view of the clear glass container and vials that contain unknowns as well as a plastic container, seen here in the upper left of the photo, that is not closed and is labeled as "Sodium Phosphate Dibasic, Anhydrous," and requires a waste determination.		



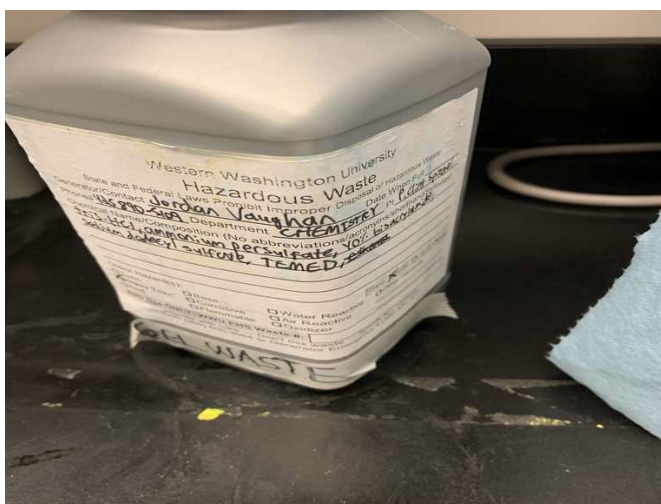
[Title]		IMG_0179.jpg	
10/18/2022 12:04 PM		Photographer: Jon Jones	
Room 470/Research lab		No CBI	No PII
Close up view, looking down into the same container, seen in IMG_178.jpg, that requires a waste determination.			



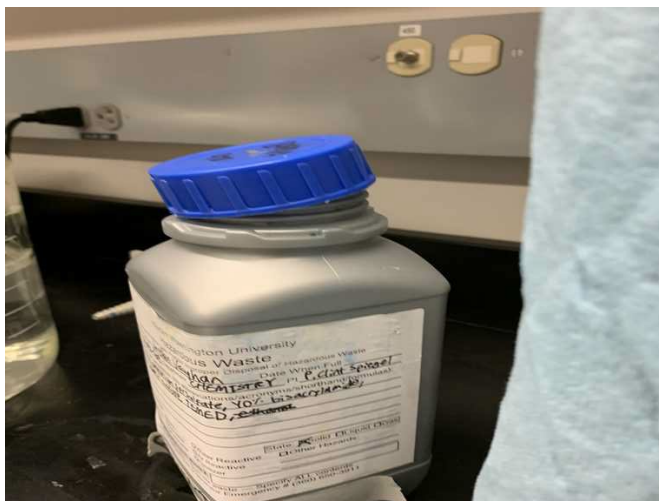
[Title]		IMG_0180.jpg	
10/18/2022 12:04 PM		Photographer: Jon Jones	
Room 470/Research lab		No CBI	No PII
View of the white bin that holds the waste containers, seen in IMG_175.jpg through IMG_179.jpg, requiring a waste determination.			



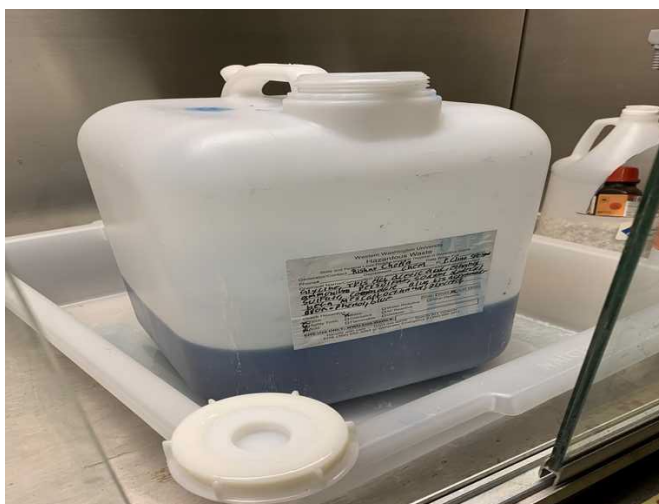
[Title]	IMG_0162.jpg	
10/18/2022 11:54 AM	Photographer: Jon Jones	
Room 480/Isotope lab	No CBI	No PII
View of waste container that is not closed.		



[Title]	IMG_0163.jpg	
10/18/2022 11:54 AM	Photographer: Jon Jones	
Room 480/Isotope lab	No CBI	No PII
Close-up view of the label on the waste container that is not closed.		

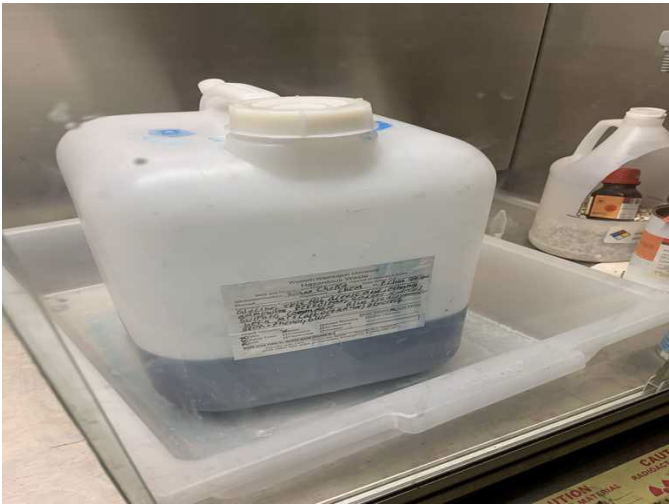


[Title]	IMG_0164.jpg	
10/18/2022 11:54 AM	Photographer: Jon Jones	
Room 480/Isotope lab	No CBI	No PII
Another close-up view of the waste container, showing that the lid is not screwed onto the container.		

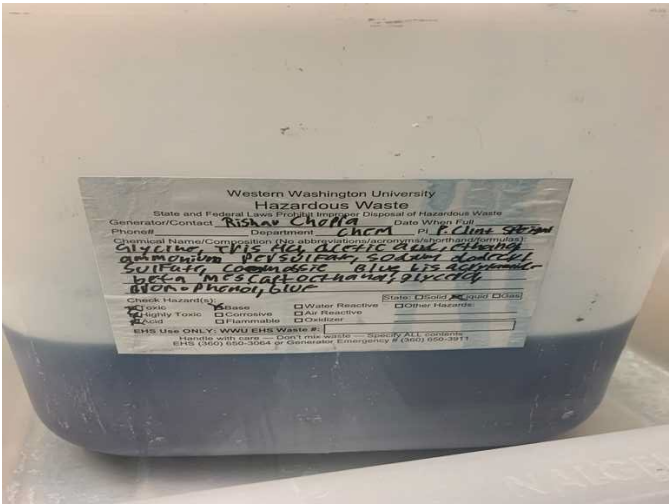


[Title]	IMG_0165.jpg	
10/18/2022 11:55 AM	Photographer: Jon Jones	
Room 480/Isotope lab	No CBI	No PII
View of another waste container that is not closed.		

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[Title]	IMG_0166.jpg	
10/18/2022 11:56 AM	Photographer: Jon Jones	
Room 480/Isotope lab	No CBI	No PII
View of the same waste container, seen in IMG_165.jpg, after being closed by Mr. Carlton.		

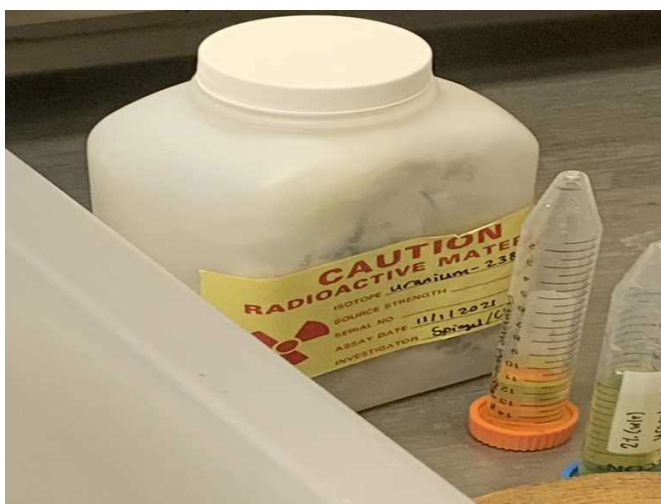


[Title]	IMG_0167.jpg	
10/18/2022 11:56 AM	Photographer: Jon Jones	
Room 480/Isotope lab	No CBI	No PII
Close-up view of the label on the waste container seen in IMG_165.jpg and IMG_166.jpg.		

Inspection Date(s): October 18-19, 2022



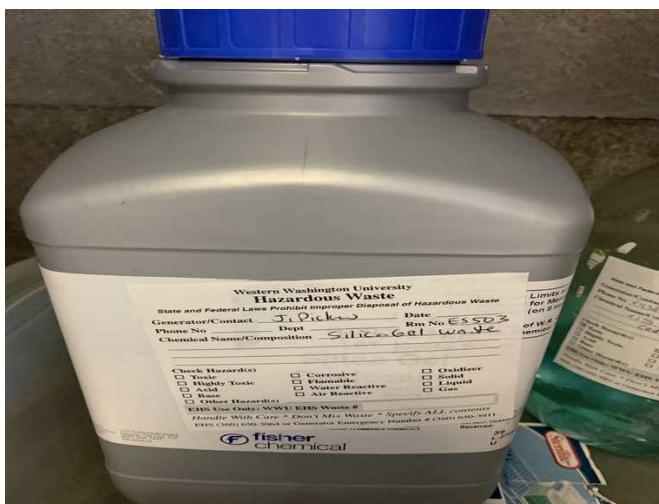
[Title]	IMG_0168.jpg	
10/18/2022 11:57 AM	Photographer: Jon Jones	
Room 480/Isotope lab	No CBI	No PII
View of a container, thought to be waste, labeled uranium-238 and dated 11/1/21.		



[Title]	IMG_0169.jpg	
10/18/2022 11:57 AM	Photographer: Jon Jones	
Room 480/Isotope lab	No CBI	No PII
Close-up view of the label on the uranium-238 container seen in IMG_168.jpg.		



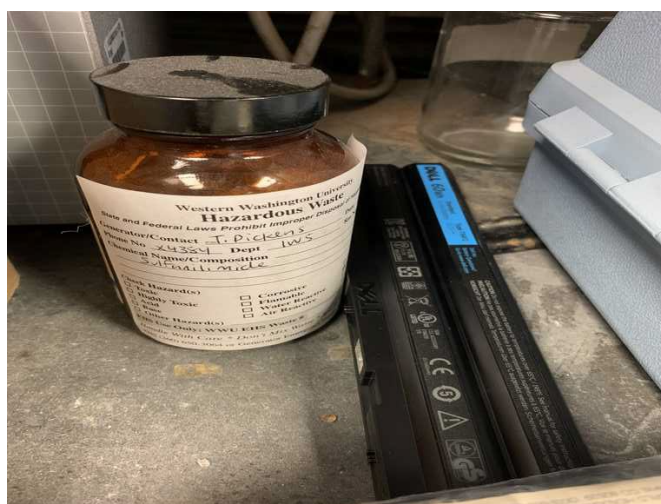
[Title]	IMG_0251.jpg	
10/18/2022 03:04 PM	Photographer: Jon Jones	
Room 503/Institute for Watershed Studies Lab	No CBI	No PII
View of a 1-gallon waste container, seen here with a blue lid, that is not marked with a hazard risk/indicator.		



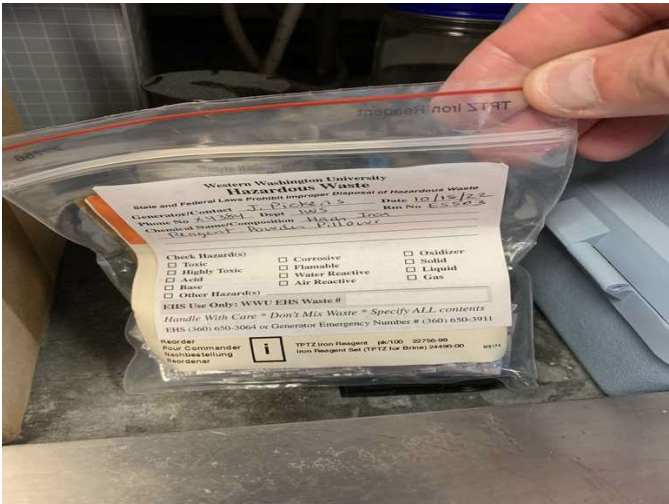
[Title]	IMG_0252.jpg	
10/18/2022 03:04 PM	Photographer: Jon Jones	
Room 503/Institute for Watershed Studies Lab	No CBI	No PII
Close-up view of the label on the 1-gallon waste container, seen in IMG_0251.jpg with a blue lid, showing that it is not marked with a hazard risk/indicator.		



[Title]		IMG_0253.jpg	
10/18/2022 03:04 PM		Photographer: Jon Jones	
Room 503/Institute for Watershed Studies Lab		No CBI	No PII
View of a pint sized, brown glass waste container and a plastic bag, containing waste. Neither the plastic bag nor the glass container are marked with a hazard risk/indicator.			



[Title]		IMG_0254.jpg	
10/18/2022 03:04 PM		Photographer: Jon Jones	
Room 503/Institute for Watershed Studies Lab		No CBI	No PII
Close-up view of the pint size waste container, showing that it is not marked with a hazard risk/indicator.			



[Title]		IMG_0255.jpg	
10/18/2022 03:05 PM		Photographer: Jon Jones	
Room 503/Institute for Watershed Studies Lab		No CBI	No PII
Close-up view of the plastic bag containing waste, showing that it is not marked with a hazard risk/indicator.			



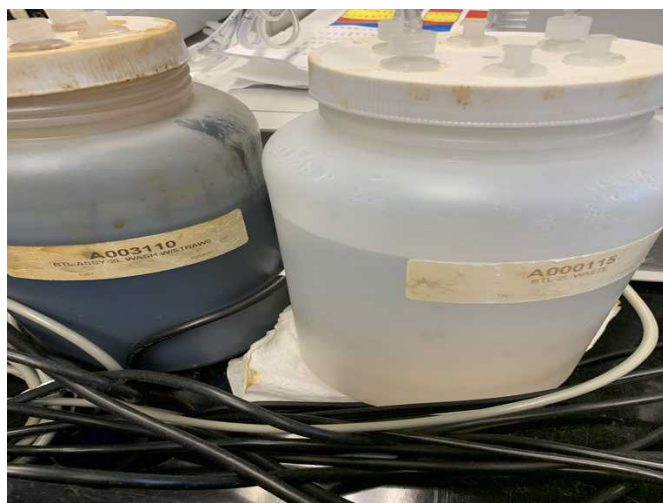
[Title]		IMG_0256.jpg	
10/18/2022 03:08 PM		Photographer: Jon Jones	
Room 503/Institute for Watershed Studies Lab		No CBI	No PII
View of suspected waste containers that are connected to lab analyzing equipment in the lab. The containers are not marked with hazardous waste labels or marked with hazard indicators.			



[Title]	IMG_0257.jpg	
10/18/2022 03:08 PM	Photographer: Jon Jones	
Room 503/Institute for Watershed Studies Lab	No CBI	No PII
View of suspected waste containers that are connected to lab analyzing equipment in the lab. The containers are not marked with hazardous waste labels or marked with hazard indicators.		



[Title]	IMG_0258.jpg	
10/18/2022 03:08 PM	Photographer: Jon Jones	
Room 503/Institute for Watershed Studies Lab	No CBI	No PII
View of suspected waste containers that are connected to lab analyzing equipment in the lab. The containers are not marked with hazardous waste labels or marked with hazard indicators.		



[Title]		IMG_0259.jpg	
10/18/2022 03:08 PM		Photographer: Jon Jones	
Room 503/Institute for Watershed Studies Lab		No CBI	No PII
View of suspected waste containers that are connected to lab analyzing equipment in the lab. The containers are not marked with hazardous waste labels or marked with hazard indicators.			



[Title]		IMG_0260.jpg	
10/18/2022 03:08 PM		Photographer: Jon Jones	
Room 503/Institute for Watershed Studies Lab		No CBI	No PII
View of suspected waste containers that are connected to lab analyzing equipment in the lab. The containers are not marked with hazardous waste labels or marked with hazard indicators.			



[Title]	IMG_0312.jpg	
10/19/2022 09:00 AM	Photographer: Jon Jones	
Room 51/Glaze Room	No CBI	No PII
View of two, 5-gallon containers and a half-gallon container of waste glaze. The waste containers seen here are not closed, not labeled with the words "Hazardous Waste", or marked with hazard risks/indicators.		



[Title]	IMG_0313.jpg	
10/19/2022 09:00 AM	Photographer: Jon Jones	
Room 51/Glaze Room	No CBI	No PII
Another view of two, 5-gallon containers and a half-gallon container of waste glaze. The waste containers seen here are not closed, not labeled with the words "Hazardous Waste", or marked with hazard risks/indicators.		

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[Title]	IMG_0314.jpg	
10/19/2022 09:00 AM	Photographer: Jon Jones	
Room 51/Glaze Room	No CBI	No PII
Close-up view of one of the 5-gallon waste containers, showing that it is not closed, not marked with a hazardous waste label or a hazard risk/indicator.		



[Title]	IMG_0315.jpg	
10/19/2022 09:00 AM	Photographer: Jon Jones	
Room 51/Glaze Room	No CBI	No PII
Close-up view of the half-gallon waste container, showing that it is not closed, not marked with a hazardous waste label or a hazard risk/indicator.		

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[Title]	IMG_0316.jpg	
10/19/2022 09:00 AM	Photographer: Jon Jones	
Room 51/Glaze Room	No CBI	No PII
Close-up view of the other 5-gallon waste container, showing that it is not closed, not marked with a hazardous waste label or a hazard risk/indicator.		



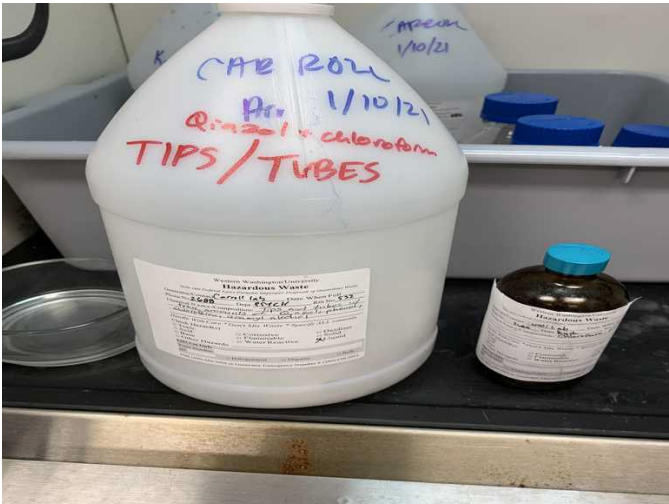
[Title]	IMG_0317.jpg	
10/19/2022 09:00 AM	Photographer: Jon Jones	
Room 51/Glaze Room	No CBI	No PII
Another view of two, 5-gallon containers and a half-gallon container of waste glaze. The waste containers seen here are not closed, not labeled with the words "Hazardous Waste", or marked with hazard risks/indicators.		



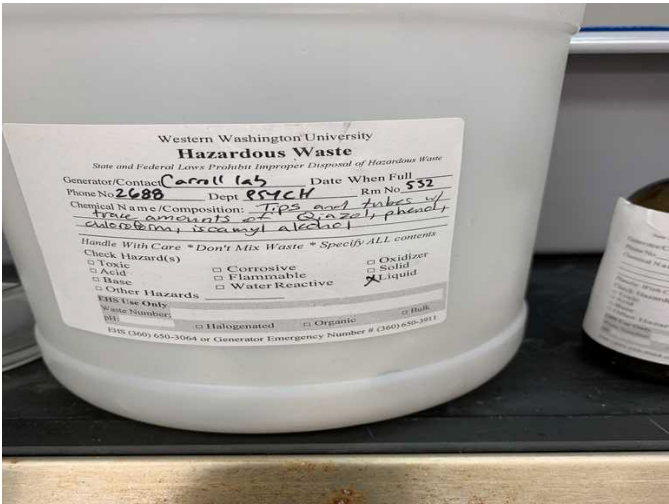
[Title]	IMG_0318.jpg	
10/19/2022 09:01 AM	Photographer: Jon Jones	
Room 51/Glaze Room	No CBI	No PII
Another view of two, 5-gallon containers and a half-gallon container of waste glaze. The waste containers seen here are not closed, not labeled with the words "Hazardous Waste", or marked with hazard risks/indicators.		



[Title]	IMG_0306.jpg	
10/19/2022 08:42 AM	Photographer: Jon Jones	
Room 532/Fume hood	No CBI	No PII
View of three waste containers that are all not marked with hazard risks/indicators.		

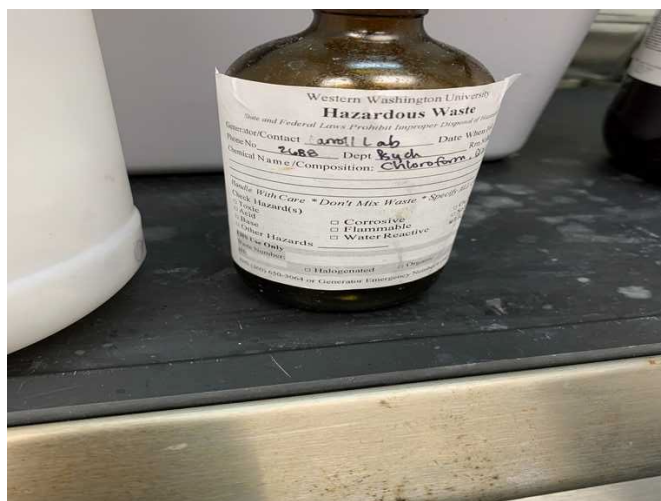


[Title]	IMG_0307.jpg	
10/19/2022 08:42 AM	Photographer: Jon Jones	
Room 532/Fume hood	No CBI	No PII
Close-up view of the labels showing that no hazard risk/indicator is marked.		

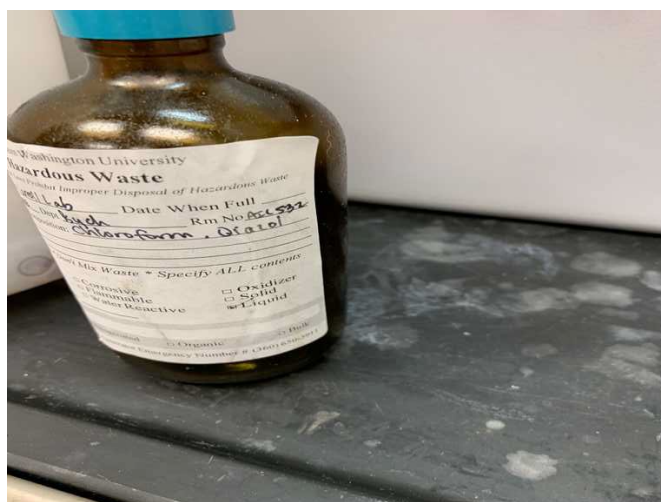


[Title]	IMG_0308.jpg	
10/19/2022 08:42 AM	Photographer: Jon Jones	
Room 532/Fume hood	No CBI	No PII
Close-up view of the labels showing that no hazard risk/indicator is marked.		

Inspection Date(s): October 18-19, 2022

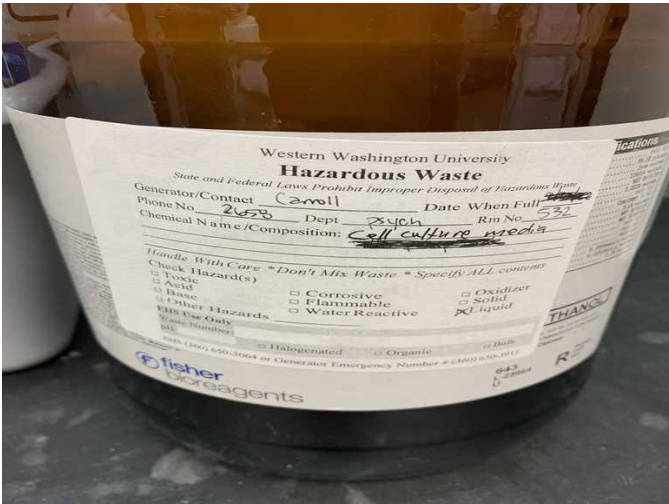


[Title]	IMG_0309.jpg	
10/19/2022 08:43 AM	Photographer: Jon Jones	
Room 532/Fume hood	No CBI	No PII
Close-up view of the labels showing that no hazard risk/indicator is marked.		

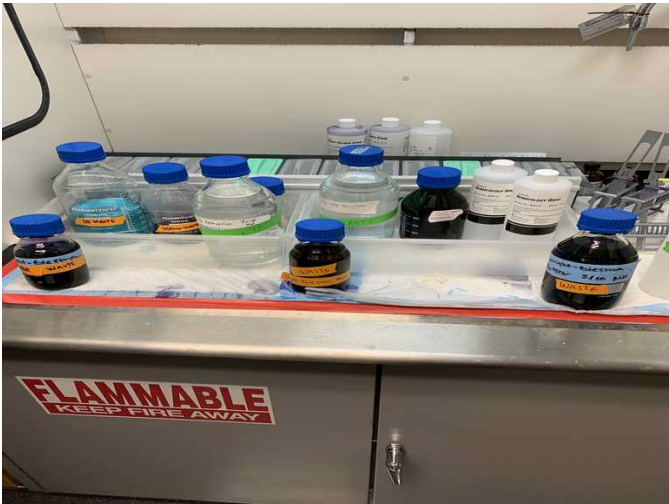


[Title]	IMG_0310.jpg	
10/19/2022 08:43 AM	Photographer: Jon Jones	
Room 532/Fume hood	No CBI	No PII
Close-up view of the labels showing that no hazard risk/indicator is marked.		

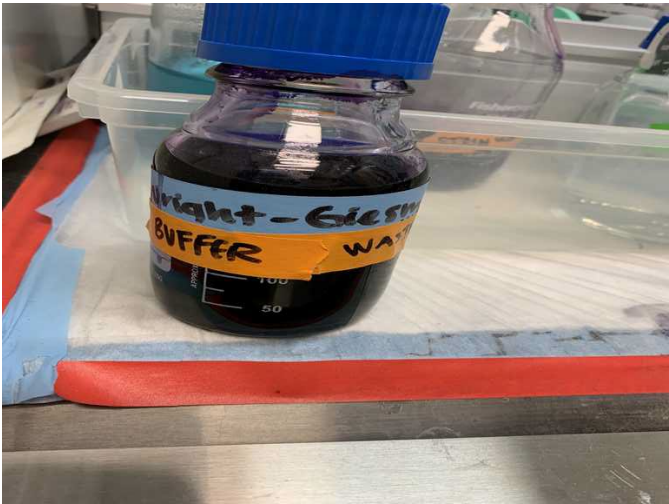
Inspection Date(s): October 18-19, 2022



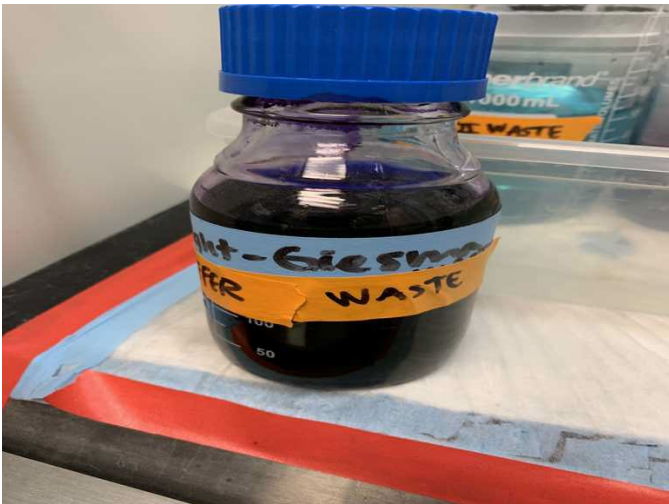
[Title]	IMG_0311.jpg	
10/19/2022 08:43 AM	Photographer: Jon Jones	
Room 532/Fume hood	No CBI	No PII
Close-up view of the labels showing that no hazard risk/indicator is marked.		



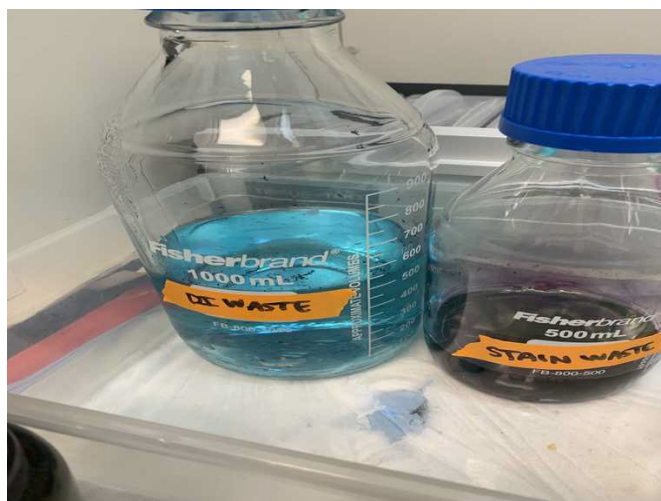
[Title]	IMG_0295.jpg	
10/19/2022 08:36 AM	Photographer: Jon Jones	
Room 542/Fume hood	No CBI	No PII
View of eight, various sized containers that are labeled with the word "Waste", but are not marked with hazardous waste labels or hazard risks/indicators.		



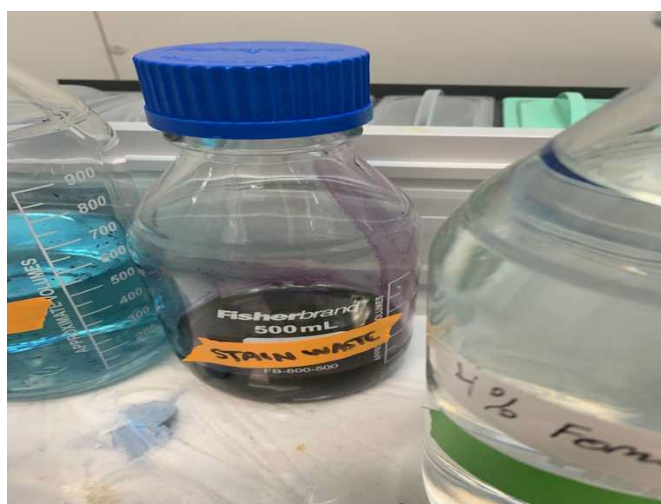
[Title]	IMG_0296.jpg	
10/19/2022 08:36 AM	Photographer: Jon Jones	
Room 542/Fume hood	No CBI	No PII
Close-up view of one of the containers seen in IMG_0295.jpg, not marked with a hazardous waste label or a hazard risk/indicator.		



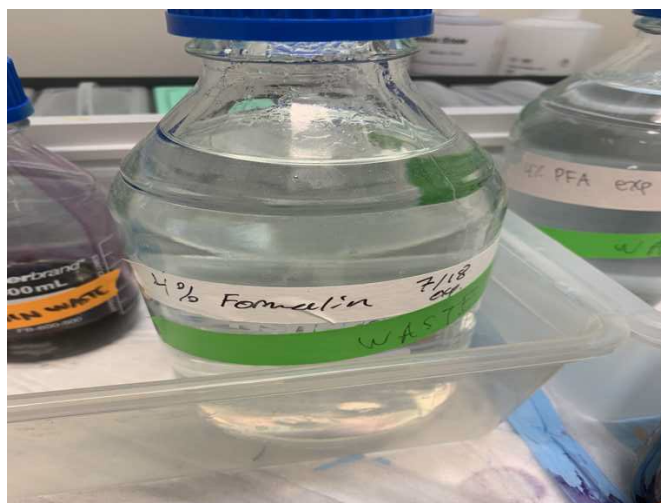
[Title]	IMG_0297.jpg	
10/19/2022 08:36 AM	Photographer: Jon Jones	
Room 542/Fume hood	No CBI	No PII
Another view of the same container seen in IMG_0296.jpg.		



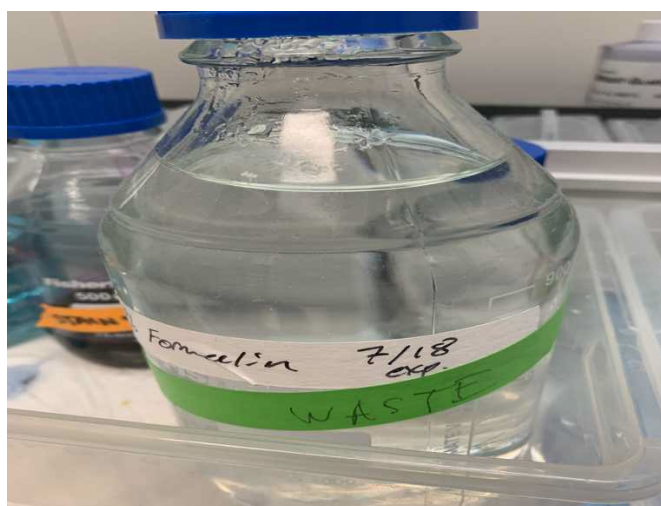
[Title]	IMG_0298.jpg	
10/19/2022 08:36 AM	Photographer: Jon Jones	
Room 542/Fume hood	No CBI	No PII
Close-up view of some of the containers seen in IMG_0295.jpg, not marked with a hazardous waste label or a hazard risk/indicator.		



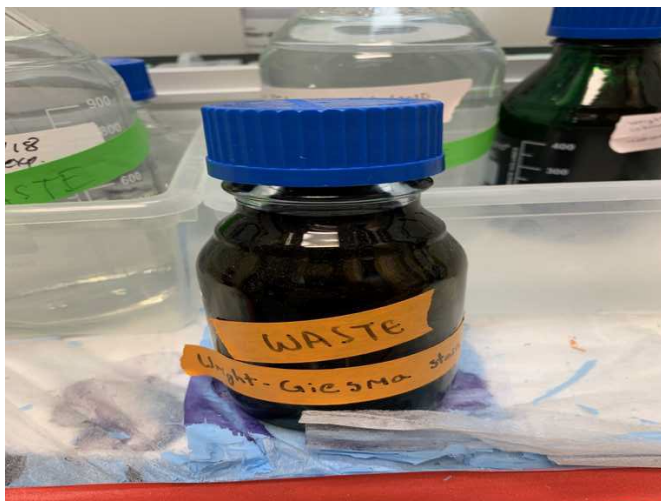
[Title]	IMG_0299.jpg	
10/19/2022 08:36 AM	Photographer: Jon Jones	
Room 542/Fume hood	No CBI	No PII
Another view of the same waste containers seen in IMG_0298.jpg.		



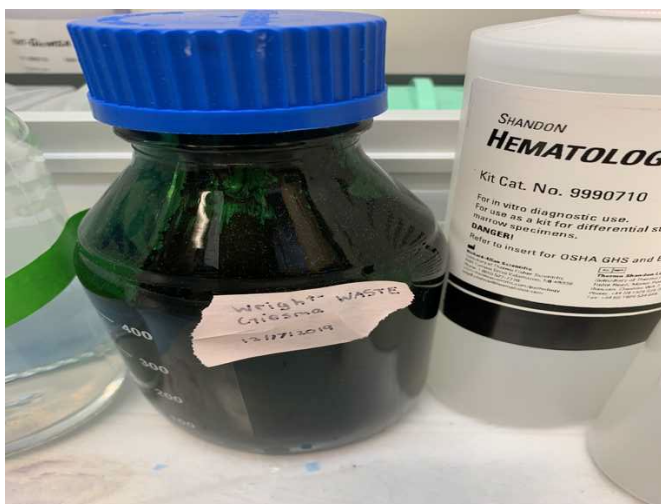
[Title]	IMG_0300.jpg	
10/19/2022 08:36 AM	Photographer: Jon Jones	
Room 542/Fume hood	No CBI	No PII
Close-up view of one of the containers seen in IMG_0295.jpg, not marked with a hazardous waste label or a hazard risk/indicator.		



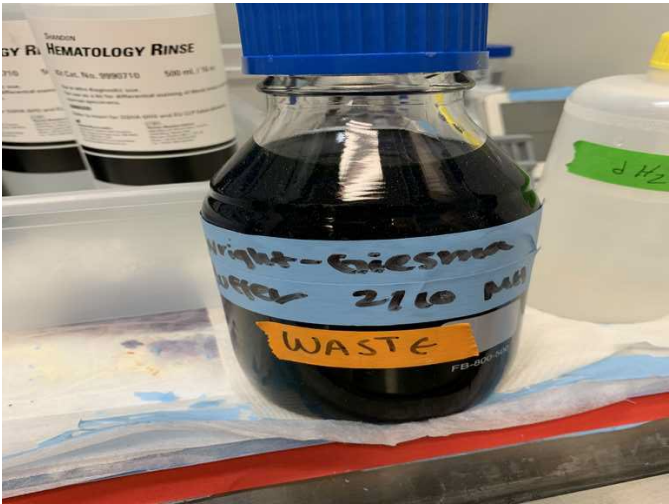
[Title]	IMG_0301.jpg	
10/19/2022 08:36 AM	Photographer: Jon Jones	
Room 542/Fume hood	No CBI	No PII
Another close-up view of the same container seen in IMG_0300.jpg.		



[Title]	IMG_0302.jpg	
10/19/2022 08:36 AM	Photographer: Jon Jones	
Room 542/Fume hood	No CBI	No PII
Close-up view of one of the containers seen in IMG_0295.jpg, not marked with a hazardous waste label or a hazard risk/indicator.		



[Title]	IMG_0304.jpg	
10/19/2022 08:37 AM	Photographer: Jon Jones	
Room 542/Fume hood	No CBI	No PII
Close-up view of one of the containers seen in IMG_0295.jpg, not marked with a hazardous waste label or a hazard risk/indicator.		



[Title]	IMG_0305.jpg	
10/19/2022 08:37 AM	Photographer: Jon Jones	
Room 542/Fume hood	No CBI	No PII
Close-up view of one of the containers seen in IMG_0295.jpg, not marked with a hazardous waste label or a hazard risk/indicator.		



[Title]	IMG_0322.jpg	
10/19/2022 09:32 AM	Photographer: Jon Jones	
Room FI240/Painting Studio	No CBI	No PII
View of a 30-gallon hazardous waste container with attached funnel, seen here with the funnel lid not latched and not closed.		



[Title]	IMG_0323.jpg	
10/19/2022 09:32 AM	Photographer: Jon Jones	
Room FI240/Painting Studio	No CBI	No PII
Close-up view of the funnel latch, showing that the container is not closed.		



[Title]	IMG_0324.jpg	
10/19/2022 09:32 AM	Photographer: Jon Jones	
Room FI240/Painting Studio	No CBI	No PII
View of a 5-gallon plastic container, seen in the bottom and on the right, that is holding an unknown liquid.		

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[Title]		IMG_0325.jpg	
10/19/2022 09:32 AM		Photographer: Jon Jones	
Room FI240/Painting Studio		No CBI	No PII
Close-up view of the same container seen in IMG_0324.jpg.			



[Title]		IMG_0326.jpg	
10/19/2022 09:32 AM		Photographer: Jon Jones	
Room FI240/Painting Studio		No CBI	No PII
View of various unknowns in various containers within a flammable storage cabinet.			



[Title]	IMG_0327.jpg	
10/19/2022 09:33 AM	Photographer: Jon Jones	
Room FI240/Painting Studio	No CBI	No PII
View of the same funnel, seen in IMG_0323.jpg, after being latched, closing the container.		



[Title]	IMG_0262.jpg	
10/18/2022 03:35 PM	Photographer: Jon Jones	
Waste shed/Outside and adjacent to the Engineering Tech Building	No CBI	No PII
View of a 5-gallon waste container of mixed solvent, seen here at the bottom, right side of the flammables cabinet. The container is not labeled with the words "Hazardous Waste."		

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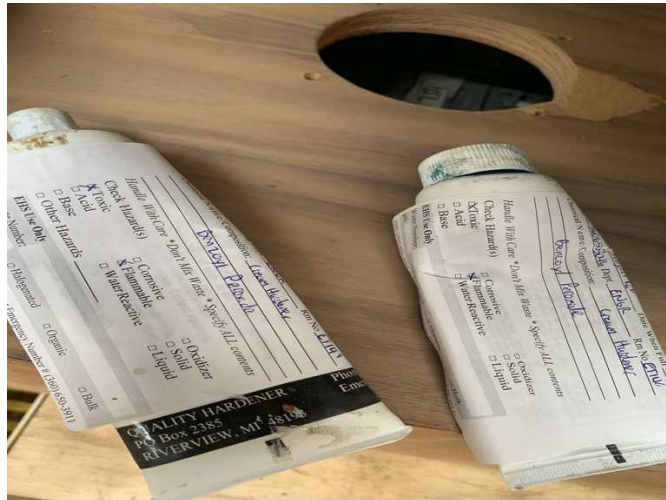


[Title]	IMG_0278.jpg	
10/18/2022 03:58 PM	Photographer: Jon Jones	
Waste shed/Outside and adjacent to the Engineering Tech Building	No CBI	No PII
View of waste containers that are not marked with hazard risks/indicators.		



[Title]	IMG_0279.jpg	
10/18/2022 04:03 PM	Photographer: Jon Jones	
Waste shed/Outside and adjacent to the Engineering Tech Building	No CBI	No PII
View of waste containers in the waste shed.		

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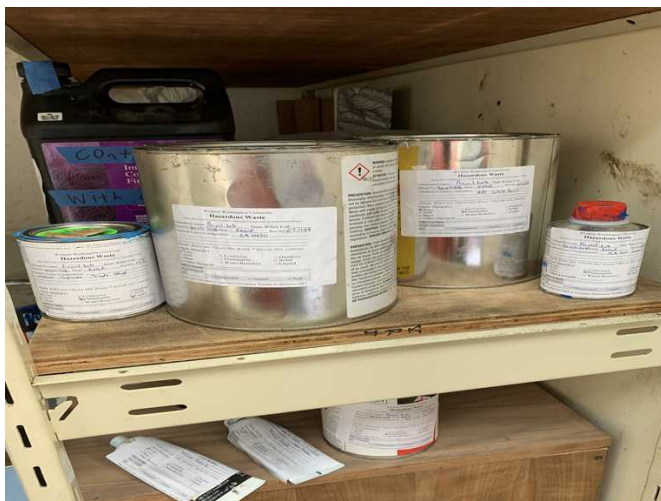


[Title]	IMG_0280.jpg	
10/18/2022 04:03 PM	Photographer: Jon Jones	
Waste shed/Outside and adjacent to the Engineering Tech Building	No CBI	No PII
View of waste containers in the waste shed.		

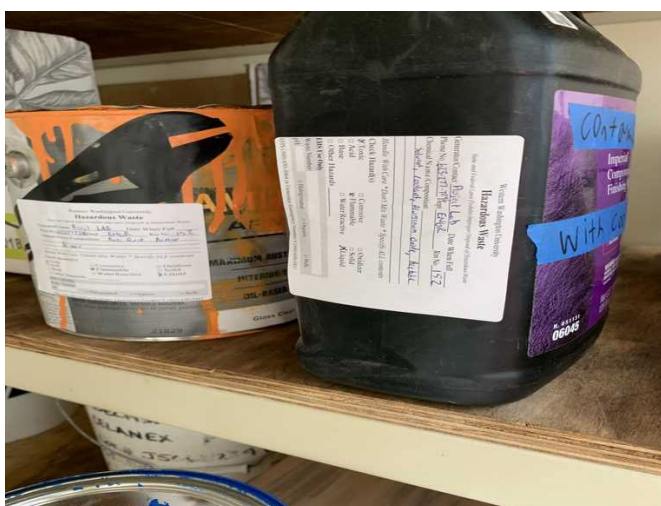


[Title]	IMG_0281.jpg	
10/18/2022 04:03 PM	Photographer: Jon Jones	
Waste shed/Outside and adjacent to the Engineering Tech Building	No CBI	No PII
View of waste containers in the waste shed.		

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[Title]	IMG_0282.jpg	
10/18/2022 04:03 PM	Photographer: Jon Jones	
Waste shed/Outside and adjacent to the Engineering Tech Building	No CBI	No PII
View of waste containers in the waste shed.		

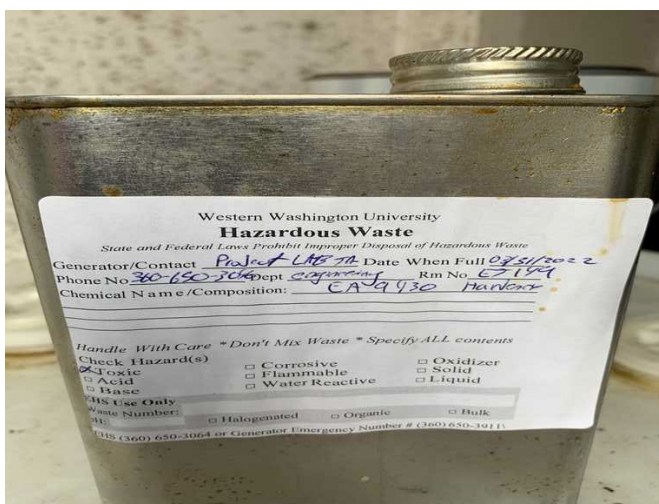


[Title]	IMG_0283.jpg	
10/18/2022 04:03 PM	Photographer: Jon Jones	
Waste shed/Outside and adjacent to the Engineering Tech Building	No CBI	No PII
View of waste containers in the waste shed.		

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[Title]	IMG_0284.jpg	
10/18/2022 04:05 PM	Photographer: Jon Jones	
Waste shed/Outside and adjacent to the Engineering Tech Building	No CBI	No PII
View of waste container that has been in accumulation for greater than 90-days. The container is seen here marked with the date 3/31/22.		



[Title]	IMG_0285.jpg	
10/18/2022 04:05 PM	Photographer: Jon Jones	
Waste shed/Outside and adjacent to the Engineering Tech Building	No CBI	No PII
Close-up view of waste container that has been in accumulation for greater than 90-days. The container is seen here marked with the date 3/31/22.		



[Title]	IMG_0286.jpg	
10/18/2022 04:08 PM	Photographer: Jon Jones	
Waste shed/Outside and adjacent to the Engineering Tech Building	No CBI	No PII
View of five waste aerosol cans.		

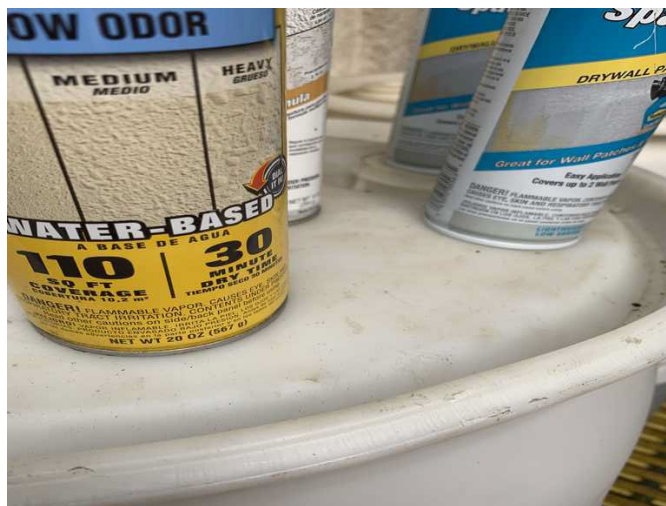


[Title]	IMG_0287.jpg	
10/18/2022 04:13 PM	Photographer: Jon Jones	
Waste shed/Outside and adjacent to the Engineering Tech Building	No CBI	No PII
View of seven waste aerosol cans that are not marked with hazardous waste labels or hazard risks/indicators.		

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[Title]	IMG_0288.jpg	
10/18/2022 04:14 PM	Photographer: Jon Jones	
Waste shed/Outside and adjacent to the Engineering Tech Building	No CBI	No PII
Another view of the waste aerosol cans seen in IMG_0287.jpg.		

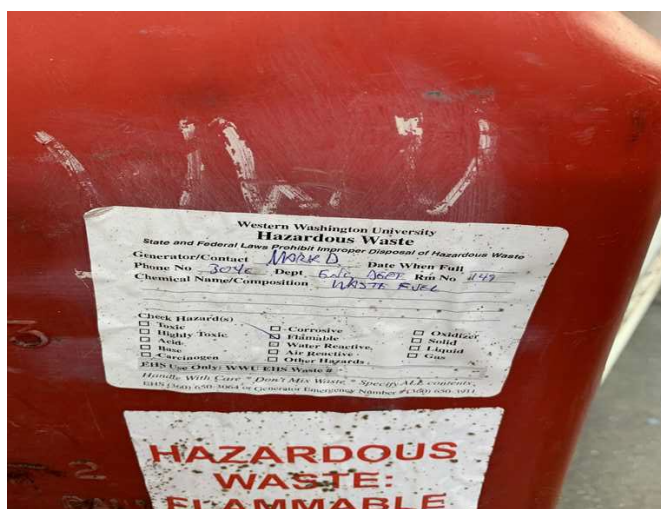


[Title]	IMG_0289.jpg	
10/18/2022 04:14 PM	Photographer: Jon Jones	
Waste shed/Outside and adjacent to the Engineering Tech Building	No CBI	No PII
Close-up view, showing the hazards/warnings on the labels.		

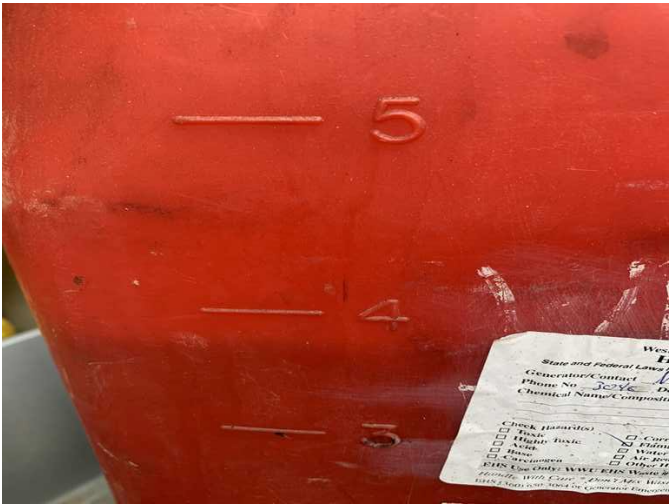
Inspection Date(s): October 18-19, 2022



[Title]	IMG_0290.jpg	
10/18/2022 04:14 PM	Photographer: Jon Jones	
Waste shed/Outside and adjacent to the Engineering Tech Building	No CBI	No PII
View of the waste gas containers.		



[Title]	IMG_0291.jpg	
10/18/2022 04:14 PM	Photographer: Jon Jones	
Waste shed/Outside and adjacent to the Engineering Tech Building	No CBI	No PII
View of the hazardous waste label on the waste gas container.		



[Title]	IMG_0292.jpg	
10/18/2022 04:14 PM	Photographer: Jon Jones	
Waste shed/Outside and adjacent to the Engineering Tech Building	No CBI	No PII
Close-up view to show the waste gas level in the waste container.		

APPENDIX 2: DOCUMENT LOG

Document Type	Document Name	Contains CBI	Contains PII	Uploaded By	Date Received
Records Review	SteriCycle Checklist 5-26-22.pdf	No	No	Jon Jones	12/13/2022
Records Review	Stericycle Invoice 06.30.2022.pdf	No	No	Jon Jones	12/13/2022
Records Review	Stericycle June 2022 Invoice.pdf	No	No	Jon Jones	12/13/2022
Records Review	Stericycle Pharmaceutical Waste Checklist.pdf	No	No	Jon Jones	12/13/2022
Records Review	Dangerous Waste Training Plan 06_11_21.doc	No	No	Jon Jones	01/17/2023
Records Review	Hazardous Waste Training Record 11_2_22.xlsx	No	No	Jon Jones	01/17/2023
Records Review	LabSafety_2022-2023_Compiled.pdf	No	No	Jon Jones	01/17/2023
Records Review	Procedure for Bulking Hazardous Liquids 9_16_2021.docx	No	No	Jon Jones	01/17/2023
Records Review	StudentHealthCenter_All Staff Training list - .xlsx	No	No	Jon Jones	01/17/2023
Other - Safety Data Sheet	Ethidium bromide FisherBP1302-1 SDS.pdf	No	No	Jon Jones	01/17/2023
Other - Safety Data Sheet	Indole SDS.pdf	No	No	Jon Jones	01/17/2023
Other - Safety Data Sheet	James Alexander Ammonia Inhalant safety-data-sheet-33.pdf	No	No	Jon Jones	01/17/2023
Records Review	014224837FLE.pdf	No	No	Jon Jones	01/17/2023
Records Review	014224466FLE.pdf	No	No	Jon Jones	01/17/2023
Records Review	013299948FLE.pdf	No	No	Jon Jones	01/17/2023
Records Review	015728777FLE.pdf	No	No	Jon Jones	01/17/2023
Records Review	016449216FLE.pdf	No	No	Jon Jones	01/17/2023
Records Review	017194056FLE.pdf	No	No	Jon Jones	01/17/2023
Records Review	017194055FLE.pdf	No	No	Jon Jones	01/17/2023
Records Review	017264521FLE.pdf	No	No	Jon Jones	01/17/2023
Other - Inventory of chemicals from decommissioned labs	All Hazard Inventory Report for CB-Morse Hall 150_S.xlsx	No	No	Jon Jones	01/17/2023

Other - Inventory of Room 150 Stockroom	Inventory Report for CB-Morse Hall 150 (10-18-2022).xlsx	No	No	Jon Jones	01/17/2023
Communications	WWU Chemistry stockroom current inventory list.pdf	No	No	Jon Jones	01/17/2023
Contingency Plan	Dangerous Waste Contingency Plan rev 06_16_21.pdf	No	No	Jon Jones	01/17/2023
Communications	WWU Responses to EPA Inspection Findings 11_1_22.pdf	No	No	Jon Jones	01/17/2023
Other - Informal Inspection Findings	Informal Inspection Findings All Locations.docx	No	No	Jon Jones	01/17/2023
Records Review	014804885FLE.pdf	No	No	Jon Jones	01/17/2023
Records Review	015813905FLE.pdf	No	No	Jon Jones	01/17/2023
Records Review	016909892FLE.pdf	No	No	Jon Jones	01/17/2023
Records Review	017264524FLE.pdf	No	No	Jon Jones	01/17/2023
Weekly Inspections	Chemistry 141.pdf	No	No	Jon Jones	01/18/2023
Weekly Inspections	ET Yard.pdf	No	No	Jon Jones	01/18/2023