



Continuation

ELON UNIV.

EPA ID # NCR000000547

# 3 Type: G S Q Date Determined: 5/4/04 Class:     

Priority:      Branch: 07 Person: 018

Return to Compliance: 6/14/04               

\*Scheduled\* \*Actual\*

Reg. Type: SR Reg. Description: 262.34(d)(4) - 265.34

Comment: EMERGENCY COMMUNICATION DEVICE WAS NOT PROVIDED TO THE PERSON HANDLING HW IN THE STORAGE AREA

# 4 Type: G S Q Date Determined: 5/4/04 Class:     

Priority:      Branch: 07 Person: 018

Return to Compliance: 6/14/04               

\*Scheduled\* \*Actual\*

Reg. Type: SR Reg. Description: 262.34(d)(5)(ii)

Comment: EMERGENCY INFO. WAS NOT POSTED NEXT TO PHONE

#      Type:      Date Determined:                Class:     

Priority:      Branch:      Person:     

Return to Compliance:                    

\*Scheduled\* \*Actual\*

Reg. Type:      Reg. Description:     

Comment:     

#      Type:      Date Determined:                Class:     

Priority:      Branch:      Person:     

Return to Compliance:                    

\*Scheduled\* \*Actual\*

Reg. Type:      Reg. Description:     

Comment:     

#      Type:      Date Determined:                Class:     

Priority:      Branch:      Person:     

Return to Compliance:                    

\*Scheduled\* \*Actual\*

Reg. Type:      Reg. Description:     

Comment:

**Waste Management Division  
Hazardous Waste Section**

**NOTICE OF VIOLATION**

To: Elon University  
2400 Campus Box  
Elon, NC 27244-2020

Docket # 2004-175  
Inspection Date: May 4 & 11, 2004  
Facility Type: Generator

EPA ID # NCR 000 000 547

On December 18, 1980, the State of North Carolina, Hazardous Waste Section (State) was authorized to operate the State RCRA hazardous waste program under the Solid Waste Management Act (ACT), N.C.G.S. 130A, Article 9 and rules promulgated thereto at 15A NCAC 13A (Rules) in lieu of the federal RCRA program.

On May 4 & 11, 2004, Phillip G. Orozco, representing the N.C. Hazardous Waste Section, inspected your facility for compliance with North Carolina Hazardous Waste Management Rules. During that inspection, the following violations were noted:

Citation                      Specifics

- i. **40 CFR 262.11** in that a person who generates a solid waste must determine if the waste is a hazardous waste using the methods described by this Rule. On May 4, 2004, two small containers of "unknown" waste were observed in the Stock Room, Room 308, in the McMichael Building. One container was a 4-liter glass jug, and the other, a 4 oz. glass bottle.
- ii. **40 CFR 262.34(d)(2) – 15A NCAC 13A .0110(i) - 265.174** in that the owner or operator must inspect the areas where hazardous waste is stored, at least weekly, looking for leaks or deterioration of the containers. Elon University was not aware of this Rule. Therefore, no inspections have been conducted.
- iii. **40 CFR 262.34(d)(4) – 265.34** whenever hazardous waste is being handled (in the storage area) all personnel involved in the operation must have immediate access to an internal alarm or emergency communication device, either directly or through visual or voice contact with another employee ("buddy system.") No communication device is located at the storage room and the "buddy system" has not been used.
- iv. **40 CFR 262.34(d)(5)(ii)** in that the generator must post certain emergency information next to the phone, including the names & telephone number of the emergency coordinator and location of fire extinguishers & spill control material and, if present, fire alarm.

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**You are hereby required to correct the noted violation(s) by June 14, 2004.**

In further satisfaction of **Docket # 2004-175**, this facility shall provide written certification with supporting documentation on company letterhead confirming that the noted compliance schedule has been completed. Mail this certification to Phillip G. Orozco, NCDENR, Division of Waste Management - Hazardous Waste Section, 1646 Mail Service Center, Raleigh, NC, 27699-1646, by the noted compliance date.

You are hereby required to comply with the noted violation(s) by June 14, 2004, at which time a reinspection will be performed. If compliance with the violation(s) noted above are not met, pursuant to N.C.G.S. 130A-22(a) and 15A NCAC 13B .0701 - .0707, an administrative penalty of up to \$25,000.00 per day may be assessed for violation of the hazardous waste law or regulations.

5/11/04  
(Date)

Phillip G. Orozco  
Phillip G. Orozco  
Waste Management Specialist  
Hazardous Waste Section, NCDENR

I, Phillip G. Orozco, hereby certify that I have personally served a copy of this Notice on:

ALLEN POE at ELON UNIV., ELON, NC  
(Name) (Location)

on 5/11, 2004.

Allen Poe  
(Recipient's Signature)

copies to: PGO  
Mike Williford - Eastern Area Compliance Branch Supervisor  
Central Files

**STATE OF NORTH CAROLINA  
DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES  
DIVISION OF WASTE MANAGEMENT  
HAZARDOUS WASTE SECTION**

**COMPREHENSIVE EVALUATION INSPECTION (CEI) REPORT  
SMALL QUANTITY GENERATOR**

**1. FACILITY INFORMATION:**

Name:                   Elon University  
EPA ID Number:       NCR 000 000 547  
Type of Facility:       Small Quantity Generator (SQG)  
Facility Location:     2400 Campus Box, Elon, NC 27244-2020  
Telephone Number:   (336) 278-5555  
County:                Alamance

**2. FACILITY CONTACT:**   Alan Poe, Paul Weller (Chemistry Dept.)

**3. SURVEY PARTICIPANTS:**   Paul Weller on 5/4/04, Alan Poe on 5/11/04

KEITH DIMONT (VEHICLE MAINTENANCE)  
Phillip G. Orozco for NCDENR

**4. DATE OF INSPECTION:**   May 4 & 11, 2004

**5. PURPOSE OF INSPECTION:** Unannounced audit to determine compliance with regulations described at 40 CFR 261, 262, 265, 268, 273 and 279. This was the first CEI conducted at the university.

**6. FACILITY DESCRIPTION:**

Elon University is a private four year college. Approximately, 4,500 students are enrolled at the university. Most of the hazardous waste generated at the university comes from four, main chemistry laboratories located in the McMichael Center.

THE UNIV. ALSO OPERATES A CONDITIONALLY EXEMPT GENERATOR AT THE OPERATIONS CENTER

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**7. HAZARDOUS WASTE STREAMS INCLUDE:**

D001, D002 \_\_\_\_\_  
F003 (waste methanol) \_\_\_\_\_

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8. AREAS OF REVIEW AND INSPECTION:

< **Emergency Preparedness** – No alarm of phone is located in the hazardous waste storage room located at the McMichael Center. In addition, the “buddy system is not typically used while in the storage area. The storage room is equipped with a water sprinkler system; however, no fire extinguisher (or special extinguishing equipment – foam, inert gas or dry chemical) is located in the immediate area of the storage area.

< **Emergency Information Posted** – No (See deficiencies below.)

< **Inspection Records (storage)** – No. Hazardous waste is typically not taken to the storage area until the end of each semester. Then, the waste is transported for disposal after a vendor has been selected from a bidding process. Weekly inspections are not conducted while the waste in storage.

< **Training** - OK

< **Manifests / LDR** - OK - BASICALLY, ELON'S HW HAS BEEN MANIFESTED ONCE A YEAR.

< **Transporters:** CHEMICAL ANALYTICS MID 985-568 021

< **TSD's:** CHEMICAL ANALYTICS MID 985-568 021

< **Accumulation Areas:**

Four separate laboratories and one, chemical stock room (Room 308) were observed containing satellite accumulation areas within each room. Room 304 – General Chemistry; Room 310 – Organic Chemistry; Room 312 – Inorganic Chemistry; and Room 314 – Physical Chemistry.

VARIOUS SMALL CONTAINERS OF NON-HAZARDOUS WASTE WERE OBSERVED 'OPEN' IN ROOM 312.  
EX. CORAL SOLN PLATED TO GLASS CONTAINER,  
MOLYBDENUM/ACETIC ACID SOLN.  
P&O NITROANILINE (SP?) - TOXIC

< **Storage Areas:**

Hazardous waste is stored in a chemical storage room located within the chemistry building, with the only entrance to it being an outside door.

ONE SMALL (80L) CONTAINER OF NON-HAZ. WASTE WAS OBSERVED → DELETED RAO. WASTE.



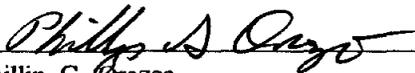
11. COMMENTS:

40 CFR 262.34(d)(4) – 265.32(a) & (c) in that the facility must be equipped with an internal communications or alarm system capable of providing immediate emergency instruction (voice or signal) to facility personnel; and, the facility must be equipped with portable fire extinguishers (or special extinguishing equipment – foam, inert gas or dry chemical) and spill control equipment.

- MAINTAIN UNIVERSAL WASTE IN ACCORDANCE WITH THE RULES, USED LAMPS MUST BE PUT IN CONTAINERS CONTAINERS MUST BE MARKED AS "USED LAMPS." BATTERIES MUST BE MARKED AS "USED BATTERIES." CONTAINERS OF USED LAMPS SHOULD BE DATED.

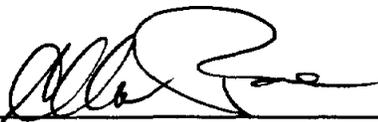
NOTE: UNIVERSAL WASTE IS STORED AT THE OPERATIONS CENTER LOCATED OFF-CAMPUS.

- USED OIL MGMT. (OFF-CAMPUS) - OK
- VEHICLE MAINTENANCE SHOP LOCATED OFF-CAMPUS SHALL BE CONSIDERED A CESQ - PARTS WASHER FLUID HAS F.P.T. = 131°F



Phillip G. Orozco  
Waste Management Specialist, NCDENR

DATE: 5-11-04



for Elon University

DATE: 5-11-04