

**Hazardous Waste Compliance Data Entry Form - Side A**

*mlg*  
*3/15*

EPA ID Number: NCR000000547

Facility Name: ELON UNIVERSITY City: ELON

EVALUATION DATA New:  Change:  Delete:

Mo. Day Yr. Type:  
 Date: ~~5/11/04~~ ~~CSE~~  
 Date: 6/24/04 CSE

Inspector ID #: 018 Reason: 01

Evaluation Comments:  
TNOV ISSUED ON 5/11/04  
ALL VIOLATIONS CORRECTED

SNC DETERMINATION: If this evaluation resulted in a SNC determination, fill in this block. (NOTE: SNC determinations are SNY/SNN evaluations. The SNY/SNN evaluation can also be submitted later on a separate form.)  
 Facility is (Check one)  
 - a SNC (SNY evaluation)  Docket # 2004-175  
 or  
 - no longer a SNC (SNN eval.)

**YES / NO CSE ONLY**

Waste Involved	Volume	Exposure Media (a. gv. sw, s)	Distance to Residences	Number of People involved	Distance to On-site wells	Distance to Off-site wells

# 1 Type: GGR Date Determined 05/04/04 Class:   

Priority:    Branch: 07 Person: 018

Return to Compliance 6/14/04 6/24/04  
\*Scheduled\* \*Actual\*

Reg. Type: SR Reg. Description: 262.11

Comment: FAILED TO MAKE A PROPER WASTE DETERMINATION ON 2 SMALL CONTAINERS OF WASTE

# 2 Type: GSQ Date Determined: 5/4/04 Class:   

Priority:    Branch: 07 Person: 018

Return to Compliance: 6/14/04 6/24/04  
\*Scheduled\* \*Actual\*

Reg. Type: SR Reg. Description: 262.34(d)(2) - 15A NCAC 13A.010(i) - 265.174

Comment: FAILED TO CONDUCT & RECORD WEEKLY INSPECTIONS OF HW STORAGE CONTAINERS

Continuation

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

Priority:      Branch: 07 Person: 018

Return to Compliance: 6/14/04 6/24/04  
\*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 6/24/04  
\*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:

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

COMPLIANCE SCHEDULE EVALUATION (CSE) REPORT

1. **FACILITY INFORMATION:** DOCKET # 2004-175

Facility 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:** ALAN POE & PAUL WELLER  
Phillip G. Orozco & Mike Williford - NCDENR

4. **DATE OF EVALUATION:**        **June 24, 2004**

5. **PURPOSE OF EVALUATION:**   Follow-up inspection to determine the status of the compliance schedule given in the Notice of Violation, Docket # 2004-175. The NOV was issued subsequent to the RCRA inspection conducted on May 4 & 11, 2004.

6. **FACILITY DESCRIPTION:**        REFER TO PREVIOUS INSPECTION.

**HAZARDOUS WASTE STREAMS INCLUDE:**   REFER TO PREVIOUS INSPECTION.

7. **AREAS RE-INSPECTED DURING EVALUATION:**  
(OK = previous deficiency corrected; V = violation observed; NA = not applicable to this inspection)

Contingency Plan   *NA*

Personnel Training Records   *NA*

Accumulation Areas   *OK*

Storage Areas        *OK*

Inspection Logs       *OK*

Manifests            *OK*

OTHER

**8. PREVIOUS VIOLATION(S) / CORRECTIVE ACTION(S):**

Violation(s) previously cited pertained to the following regulation(s):

- 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.

WASTE WAS TRANSPORTED AS HAZARDOUS

- 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.

INSPECTIONS ARE CONDUCTED & RECORDED WKLY

- 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.

A PHONE WAS INSTALLED NEARBY

- 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.

INFO. HAS BEEN POSTED

**9. CONCLUSION(s):**

Elon University submitted written certification of compliance with NOV Docket # 2004-175 in a letter dated June 7, 2004 and received by the Hazardous Waste Section on June 9, 2004.

The re-inspection confirms compliance.

NO FURTHER ACTION NECESSARY

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

DATE: 6/24/04

[Signature]  
Facility Representative

DATE: 6-24-04

**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.

[Signature]  
(Recipient's Signature)

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



# ELON

## UNIVERSITY

June 7, 2004

Phillip G. Orozco, NCDENR  
Division of Waste Management  
Hazardous Waste Section  
1646 Mail Service Center  
Raleigh, N.C. 27699-1646

Mr. Orozco:

In satisfaction of **Docket # 2004-175**, I do hereby confirm that the noted compliance schedule, per inspection date of May 4 & 11, 2004, has been completed before noted compliance date of June 14, 2004.

The following adjustments have been made and are completed:

<u>Number</u>	<u>Citation</u>	<u>Specifics</u>
1	40 CFR 262.11	Bottles were identified and labeled
2	40 CFR 262.34(d)(2)	Inspection sheets are now located in storage room
3	40 CFR 262.34(d)(4)-265.34	Phone has been installed in adjoining room
4	40 CFR 262.34(d)(5)(ii)	Emergency information located next to phone and the Fire Extinguisher
5	40 CFR 262.34(d)(5)(ii)	Spill kit located in storage room

Thank you,

Allen Poe  
Director of Safety  
Elon University

Cc: Ken Mullen