

Hazardous Waste Section  
File Room Document Transmittal Sheet

17

Your Name: Phil Orozco  
EPA ID: NCD052547635  
Facility Name: GlaxoSmithKline - South Campus  
Document Group: Inspection/Investigation (I)  
Document Type: Compliance Evaluation Inspection (CEI)  
Description:  
Date of Doc: 2/22/2011  
Author of Doc: Phil Orozco

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**File Room Use Only**

NCD052547635

Date Recieved by File Room:

Month	Day	Year

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Hazardous Waste Section  
File Room Document Transmittal Sheet

I. **Identification:**

Fill out form completely and accurately before sending it to File Room

Your Name	Orozco, Phillip <small>Print Your Name Above (Last, First)</small>													
EPA ID #	N	C	D	0	5	2	5	4	7	6	3	5		
Facility Name	GlaxoSmithKline – South Campus <small>Facility's Name as it appears in RCRAInfo</small>													

II. **Document Type:**

Highlight, check or **Circle** ONLY ONE Document Type below

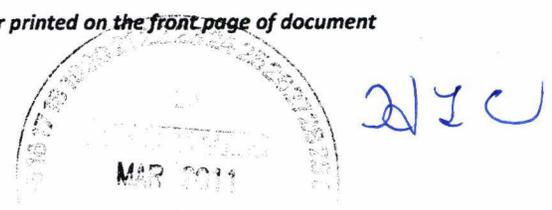
<p><b>General (G)</b></p> <input type="checkbox"/> Compliance Assistance Visit (CAV) <input type="checkbox"/> Fees/Invoices (F) <input type="checkbox"/> Hazardous Waste Report (HWR) <input type="checkbox"/> Notification 8700 (8700) <input type="checkbox"/> Technical Assistance (TA) <input type="checkbox"/> Correspondence (C) <input type="checkbox"/> Other (O)	<p><b>Permit (P)</b></p> <input type="checkbox"/> Alternative to Post-Closure Permit (APC) <input type="checkbox"/> Emergency Permit (EMP) <input type="checkbox"/> Modification (MOD) <input type="checkbox"/> Notice of Deficiency (NOD) <input type="checkbox"/> Part A Application (PA) <input type="checkbox"/> Part B Application (PB) <input type="checkbox"/> Permitting Information (PI) <input type="checkbox"/> Correspondence (C) <input type="checkbox"/> Other (O)	<p><b>Corrective Action (CA)</b></p> <input type="checkbox"/> Confirmatory Sampling (CS) <input type="checkbox"/> Corrective Action Information (CAI) <input type="checkbox"/> Corrective Measure Plan/Design (CMPD) <input type="checkbox"/> Corrective Measures Study (CMS) <input type="checkbox"/> Environmental Indicators (EI) <input type="checkbox"/> HSWA Remedy (HSWA) <input type="checkbox"/> Interim Measures Study/Plan/Implemented (IM) <input type="checkbox"/> Land Use Restriction, Institutional Controls (LUR) <input type="checkbox"/> RCRA Facility Assessment (RFA) <input type="checkbox"/> RCRA Facility Investigation (RFI) <input type="checkbox"/> Remediation System Effective Reports (RSER) <input type="checkbox"/> Correspondence (C) <input type="checkbox"/> Other (O)
<p><b>Closure (C)</b></p> <input type="checkbox"/> Closure Information (CI) <input type="checkbox"/> Closure Plan (CP) <input type="checkbox"/> Closure Report/Certification (CR) <input type="checkbox"/> Correspondence (C) <input type="checkbox"/> Other (O)	<p><b>Groundwater (GW)</b></p> <input type="checkbox"/> Comprehensive Monitoring Event (CME) <input type="checkbox"/> Groundwater Monitoring Report (GMR) <input type="checkbox"/> Correspondence (C) <input type="checkbox"/> Other (O)	<p><b>Enforcement (E)</b></p> <input type="checkbox"/> Administrative Order on Consent (AOC) <input type="checkbox"/> Compliance Order (CO) <input type="checkbox"/> Enforcement Package (EP) <input type="checkbox"/> Immediate Action Notice of Violation (IANOV) <input type="checkbox"/> Notice of Violation (NOV) <input type="checkbox"/> Settlement Agreement (SA) <input type="checkbox"/> Ticket Notice of Violation (TNOV) <input type="checkbox"/> Correspondence (C) <input type="checkbox"/> Other (O)
<p><b>Inspection/Investigation (I)</b></p> <input type="checkbox"/> Case Development Inspections (CDI) <input type="checkbox"/> Complaint Investigation (CMP) <input checked="" type="checkbox"/> Compliance Evaluation Inspection (CEI) <input type="checkbox"/> Compliance Schedule Evaluation (CSE) <input type="checkbox"/> Emergency Response (EMR) <input type="checkbox"/> Focused Compliance Inspection (FCI) <input type="checkbox"/> Sampling Event (SPL) <input type="checkbox"/> Correspondence (C) <input type="checkbox"/> Other (O)	<p><b>Financial (F)</b></p> <input type="checkbox"/> Balance sheets (BS) <input type="checkbox"/> Financial record review (FRR) <input type="checkbox"/> Financial statements (FS) <input type="checkbox"/> Insurances (I) <input type="checkbox"/> Mechanisms and instruments (MI) <input type="checkbox"/> Tax returns (TR) <input type="checkbox"/> Correspondence (C) <input type="checkbox"/> Other (O)	

III. **Description:**

Use up to 256 characters to describe the document. Every word below can be used as a searchable index to locate the document

IV. **Date of Document:** Date when the document generated, the date typed or printed on the front page of document

Date on Document	02	22	2011
	<small>Month</small>	<small>Day</small>	<small>Year</small>



V. **File Room Use Only:**

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*The inspection form not attached in CAI*

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

**EPA ID Number: NCD 052 547 635**

**Facility Name: GlaxoSmithKline – South**

**Address:** 3030 Cornwallis Road  
RTP, NC 27709-2700

**County:** Durham

**Contact Name: Linsey Walata** (919) 483-4640 (919-607-0720 cell)

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**EVALUATION DATA:**      **New: XX**      **Change: \_\_\_\_**      **Delete: \_\_\_\_**

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Date: **2/22/11**

Evaluation Type: CEI

Date: \_\_\_\_/\_\_\_\_/\_\_\_\_

Evaluation Type:

Inspector ID #: **018**

**Evaluation Comments:**

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

**COMPREHENSIVE EVALUATION INSPECTION (CEI) REPORT**

**1. FACILITY INFORMATION:**

Name: **GlaxoSmithKline** - South Campus  
EPA ID Number: **NCD 052 547 635**  
Type of Facility: **LQG / TSDF / STORAGE**  
Facility Location: **3030 Cornwallis Road  
RTP, NC 27709-2700**  
Telephone Number: **919-483-4640 (office); 919-607-0720 (mobile)**

**2. FACILITY CONTACT:** Lindsey Walata [lindsev.c.walata@gsk.com](mailto:lindsev.c.walata@gsk.com)

**3. SURVEY PARTICIPANTS:** Lindsey Walata, Greg Brooks; Phillip G. Orozco

**4. DATE OF INSPECTION:** **February 22, 2011**

**5. PURPOSE OF INSPECTION:** Unannounced audit to determine compliance with regulations described at 40 CFR 261, 262, 264, 265, 268, 270, 273, 279 and the facility's permit. Previous inspections were conducted on December 17, 2009, February 6, 2009, August 6, 2008, April 12, 2007 and September 15, 2006.

**6. FACILITY DESCRIPTION:**

GlaxoSmithKline (GSK) is a pharmaceutical company conducting research and development of pharmaceutical products. The facility is a LQG and a permitted treatment, storage, and disposal facility (TSDF). GSK may receive hazardous waste (HW) generated by other GSK facilities located off-site. A detailed description of the facility may be found in the RCRA Permit Application filed for permit renewal in 2008 with the Hazardous Waste Section (Section), NCDENR. The renewal permit became effective on 8/21/2010 and expires on 8/21/2020.

**7. HAZARDOUS WASTE STREAMS INCLUDE:**

**See the Permit for a full description of all waste streams.**

**Mainly D001, D002, D003, D004-D011, F002, F003, F005, P and U-listed waste;**

Waste oil & Universal Waste – Lamps. Used lamps are managed by Johnson Controls, a service contractor.

**8. AREAS OF REVIEW AND INSPECTION:**

- **Emergency Preparedness** – Every two years, GSK is required by their Permit to document their attempt to make coordination agreements with the local emergency responders. Letters documenting compliance with this requirement were last dated 12/1/08 and are on file at GSK.
- **Training Records** - RCRA annual refresher training is typically provided to all applicable persons at one time. Most of those individuals completed their refresher training on 5/11/09 & 5/10/10. Eliazzi Lebron's records were audited. The signature page for the last refresher training on 5/10/10 included most, if not all, of those who are associated with the HW management program.
- **Manifests / LDR** - complete
- **Inspection Records** - complete
- **Contingency Plan** – appeared to be in compliance
- **Operating Log / Waste Analysis Plan** – The waste analysis plan has not changed since the permit renewal application dated 9/27/07.

- **Biennial Report** – The report was submitted on 3/8/10.
- **Closure Plan** - The closure plan has not changed since the permit renewal application dated 9/27/07.
- **Waste Minimization Plan** – The plan was last certified on 9/15/10
- **Closure Cost estimate:** \$171,354.00 Expires: March 2011
- Financial Assurance: Letter of Credit; Approval letter issued by NCDENR.
- Corrective Action Cost Estimate: \$9,872,516.00
- **Transporters:**
  - Clean Harbors Environmental Services MAD 039 322 250
  - Bionomics Inc. TND 982 116 493
- **TSD's:**
  - Clean Harbors of Baltimore MDD 980 555 189
  - Clean Harbors of Reidsville NCD 000 648 451
  - GlaxoSmithKline NCD 065 655 599
  - Clean Harbors – Laporte, TX TXD 982 290 140
- **Satellite Accumulation Areas (SAAs):**

Many of the laboratories located on the GSK campus may have one or more satellite accumulation areas within each individual lab. Over the past 1-2 years, labs from the South campus have either been moved over to the North Campus or closed entirely. On this inspection, the following rooms in the North Building were inspected: 1523, 1541, 1534, 1538, 1542, 1554, 1563, 1555, 1562, 2566, 2549, 2521, 2503, 2504 and the chemical storage room 1502.
- **Storage Areas:**

The Permit describes three storage pads designated as Areas #1, #2, and #3.

Storage Area #1 can store no more than 10,560 gallons of waste solvent in containers, specifically drums and 550 gallon totes.

Storage Area #2 can store no more than 1,440 gallons of miscellaneous laboratory waste in small containers (5 gallons or less) to be placed inside steel safety cabinets or lab packs.

90-day storage area - located at the Main Research Building (MRB), Rooms MAI.A1626-A, B and D.

TOX Bldg. T0560 & MRB 4<sup>th</sup> Floor Mechanical Room is used to store used lamps containing mercury.
- **External Condition of Facility:** No adverse conditions observed. Last certified on 9/15/10.

9. **WASTE MINIMIZATION:** A written plan is in place and kept on file at the facility. The plan is certified on an annual basis. It was last certified on 9/15/09.

10. **SITE DEFICIENCIES:**  
No violations were cited.

11. **COMMENTS:**

- A. Be aware that “unwanted” chemicals are most often interpreted as a solid waste. Expired chemicals may also be deemed a solid waste unless it can be determined that the chemicals are still in use. As such, a HW determination is necessary. Once these materials are determined to be a HW, they can only remain in the SAA where they were generated or in a <90-day storage area or in GSK’s permitted HW storage areas. HW stored in any area other than those mentioned is a violation of the NC HW Management Rules.

- B. The researcher(s) working in North building's Room 1541 may wish to improve the housekeeping within the lab. No one was present in the lab and initially it appeared that the lab was no longer in use and HW was present. However, as we walked to the back of the lab we observed that processes were being conducted in the under two vacuum hoods. As labs move from the South campus to the North campus, please ensure that once operations cease in a lab that all HW is removed from the SAAs.
- C. The permit for GSK's South campus TSD does allow for a 24" aisle space. This was accepted in a letter that was a result of the GSK's comments after the public hearing for the permit renewal. However, the permit for GSK's South campus TSD still requires a 30 inch aisle space. I believe there would be no objection to approving a permit modification allowing for a 24" aisle space in the permitted areas of the North campus if that would help in any way.
- D. One funnel in Room 1534 is due to be changed out or removed from service.

  
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**Phillip G. Orozco**  
**Senior Environmental Specialist, NCDENR**

Date: February 22, 2011

***GSK South Campus  
3025 Cornwallis Rd., RTP  
Durham County  
NCD 052 547 635***

**TSDF INSPECTION FORM – PART 264  
SUPPLEMENTAL CHECLIST FOR FACILITY SPECIFIC CONDITIONS**

Introduction

Solid, hazardous, and radioactive wastes managed at the South Campus facility are generated at GlaxoSmithKline's research and development facilities, and are accumulated, packaged, and stored on-site. Hazardous Waste Storage area 1 and Hazardous Waste Storage area 2 are the permitted RCRA hazardous waste management units.

Permit effective August 21, 2010 – expires August 21, 2020.

1. Authorized Waste (Permit Condition II.A.)

<b>Waste Codes</b>	<b>Treatment and Storage Units</b>
D001 - D043	Waste Storage Areas 1, 2 and 3
F001 - F005	
P-listed wastes (see Part A)	
U-listed wastes (see Part A)	

2. General Waste Analysis (Permit Condition II.D.)

OK Documentation that the waste analysis plan is followed.

3. Inspection Requirements (Permit Condition II.F.)

OK Documentation that all container and storage areas are inspected as specified in Section F of the Permit Application.

4. Storage in Containers (Permit Condition III.)

**Container Storage Area #1**

OK 10,560 gallons maximum capacity (equivalent to 192 55-gallon drums)

**Container Storage Area #2**

OK 1,440 gallons of lab wastes (equivalent to 24 60-gallon safety cabinets)

OK 5,225 gallons of waste solvent or other liquids (equiv. to 95 55-gallon drums)

OK All hazardous waste will be stored on pallets which will elevate the waste containers. Containers may be stacked two (2) high.

OK Number of steel cabinets may vary in a given area.

5. Minimum Aisle Space (Permit Condition III.E.):

OK Minimum aisle space between rows of containers is 2 feet.

6. Documents to be Maintained at Facility Site (Permit Condition 1.F.)

OK Waste analysis plan (Section C.2 of the Application)

OK Personnel training documents and records (Section H of the Application)

OK Contingency plan (Section G of the Application)

OK Closure plan (Section I of the Application)

OK Closure cost estimate (Section I.4 of the Application)

OK Operating record (Sections C, G and I of the Application)

OK Inspection schedules (Section F of the Application)

  
Phillip G. Orozco

Senior Environmental Specialist, NCDENR

Date: February 22, 2011