



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

4WD-RCRA

JUL 17 2002

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Edward M. Movits, Health and Safety Officer
P. O. Box 1848
University, Mississippi 38677-1848

SUBJ: RCRA Compliance Evaluation Inspection
EPA I.D. No. MSD 981 865 470

Dear Mr. Movits:

On March 21, 2002, the United States Environmental Protection Agency (EPA) conducted a Resource Conservation and Recovery Act (RCRA) Compliance Evaluation Inspection (CEI) at your facility located in Oxford Mississippi, in order to determine it's compliance status with RCRA.

Enclosed is the EPA RCRA Site Inspection Report which indicates that violations of RCRA were discovered. A copy of this report has also been forwarded to Mississippi Department of Environmental Quality (MDEQ). Pursuant to the EPA-MDEQ Memorandum of Agreement, MDEQ is the lead agency for any violations cited in the report.

If you have any questions, please contact Houston Gilliland Jr., of my staff, at (404) 562-8617.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Jeffrey T. Pallas".

Jeffrey T. Pallas, Chief
South Enforcement and Compliance Section
RCRA Enforcement and Compliance Branch

Enclosure

cc: David Lee, MDEQ
Don Watts, MDEQ

RCRA Inspection Report

1) Inspector and Author of Report

Houston Gilliland
Environmental Scientist

2) Facility Information

University of Mississippi (U of M)
P.O. Box 1848
University, Mississippi 39577
(662) 325 - 3994
MSD 981 865 470

3) Responsible Official

Mr. Edward M. Movits, Health and Safety Officer

4) Inspection Participants

E. M. Movits, U of M
K. Sullivan, MDEQ
L.. Herrington, MDEQ
H. Gilliland Jr., US EPA Region 4

5) Date and Time of Inspection

March 21, 2002 10:30 A. M..

6) Applicable Regulations

Mississippi Hazardous Waste Management Regulations (MHWMR) parts 260- 266, 268 through 270.

Chapter 391-3-11 of the Mississippi Hazardous Waste Management Act, adopted and incorporated by reference Parts 260- 266, 268 through 270.

7) Purpose of Inspection

To conduct an unannounced compliance evaluation inspection (CEI) and determine the facility's compliance with all applicable regulations.

8) Facility Description

U of M's most recent Hazardous Waste Generator Notification (EPA form 8700-12) characterized the facility as a Large Quantity Generator (LQG) of hazardous waste. U of M is located in Lafayette County in the City of Oxford. It is a state institution with approximately 14,000 students.

U of M is primarily an academic and research facility with undergraduate and graduate programs in allied Health Sciences, Arts, and Sciences, Business, and Engineering, utilizing various types of organic and inorganic academic and research laboratories. A majority of waste generated at the U of M campus is from groups such as research laboratories, chemistry and biology teaching laboratories, medical, pharmacy and maintenance operations. U of M leases space for research activity to other federal, state, and related organizations. The office and staff of Health and Safety Department are responsible for the hazardous waste management activities at U of M.

9) Findings

Following a presentation of credentials by EPA and MDEQ representatives, a brief discussion of the management of hazardous waste generated within the facility was conducted. The following areas were inspected: The less than 90-day Storage Area, the Laboratories located in the Chemistry and Pharmacy buildings and the Physical Plant.

Less than 90-day Area

One storage cabinet used for less than 90-day storage was observed. The dimensions are 134" x 60". The depth of the sump or actual containment area is 8". The doors are made from 16 gauge steel. The remaining parts of the locker are made of 12 gauge steel.

During the inspection, two (2) fifty-five (55) gallon container of spent lab waste was observed. The containers were observed full, closed, labeled and in good condition. No violations of RCRA were observed.

Chemistry & Pharmacy Department

The chemistry and pharmacy research buildings are located in the central part of campus. The labs provide various environmental, analytical, physical, pharmaceutical, natural product, engineering, occupational health and developmental services.

The labs generate aqueous waste, non-hazardous solutions containing trace concentrations of acids, caustics, organic, and inorganic chemicals concentrated waste acids, caustic and organic and inorganic chemicals are accumulated in five (5) gallon containers. The chemistry and pharmacy department has approximately forty-five (45) labs. The following labs were inspected: general chemistry, microbiology, organic, inorganic, pesticide, solid state, electro/optic, mass spectroscopy, x-ray, physical insecticide, environmental chemistry, analytical, physical, qualitative and quantitative.

During the inspection of both buildings, several five (5) gallon containers were observed in the Chemistry and Pharmacy Laboratories. All containers were observed in good condition, labeled, and observed approximately 1/2 full. However, the containers were observed open.

Therefore, U of M has failed to adhere to a condition for exemption from RCRA § 3005 given in MHWMR/ 40 CFR § 265.173(a), as incorporated by 40 CFR § 262.34(c)(1)(i). This regulation requires the satellite accumulation containers to be closed except when it is necessary to add or remove waste. As such, the facility is illegally storing wastes in violation of RCRA § 3005.

Physical Plant

In this area located on the eastside of campus, is utilized for equipment transporting, and maintenance. No violations of RCRA were observed.

Record Review:

The following records were reviewed:

Manifests: All manifests generated since the last inspection were reviewed. The manifests were signed by a facility representative, and transporter. A return copy was signed by the receiving facility. All Land Ban documentation was attached and found to be complete.

Inspection Logs: Inspection logs for the less than 90-day area storage facility were available during the inspection and appeared to be complete.

Contingency Plan: A copy of the contingency was reviewed and appeared to be complete.

Personnel Training: During the inspection, personnel training records were available and appeared to be complete.


Biennial Report: A copy of the biennial report was available for review and appeared to be complete.

Based upon findings of the inspection, the facility generates more than 1000 kilograms of hazardous waste in a calendar month. Therefore, U of M is a LQG of hazardous waste.

Exit Meeting

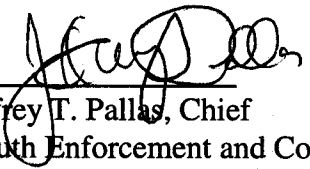
The exit interview was conducted with U of M staff. During the exit meeting, observed deficiencies were noted.

10) Signed


Houston Gilliland Jr.
Environmental Scientist

7/12/02
Date

11) Concurrence


Jeffrey T. Pallas, Chief
South Enforcement and Compliance
Section
RCRA Enforcement and Compliance Branch

7/17/02
Date