

## **Example of Violations from College Peer Audit Program**

### **Hazardous Waste (RCRA Federal Regulations)**

- 1. Failure to conduct Waste Stream Determinations for wastes generated on campus, and most prevalently in Chemistry, Biology, Art, and Physical Plant;**
- 2. Failure to have containers of known hazardous waste closed at all times, except when adding waste;**
- 3. Failure to label hazardous waste containers with the appropriate words “Hazardous Waste” or “other words to describe those wastes”;**
- 4. Accumulation of historical materials as usable materials, when no known use is recognized, and thus definition of these materials of waste is interpreted;**
- 5. Failure to have annual training in hazardous waste management procedures for campuses which are classified as a Large Quantity Generator or Small Quantity Generator;**
- 6. Storing and managing of acute P-Listed wastes in quantities which exceed 2.2 pounds per month which subsequently change the generator status of the college;**
- 7. Failure to submit change in generator status paperwork when classification increases due to monthly generation of wastes;**
- 8. Storage of hazardous waste exceeds the 90-day or 180-day time limits for each respective generator class;**
- 9. Treatment of hazardous wastes on site, by storing open containers of volatile organic hazardous waste in laboratory hoods and allowing for evaporation;**

### **Clean Water Act Federal Violations**

- 1. Failure to maintain a Spill Prevention Control and Countermeasure (SPCC) Plan due to the existence of on site storage of petroleum hydrocarbons in containers exceeding 55-gallons, and which total greater than 1,320 gallons;**
- 2. Failure to conduct SPCC annual training;**
- 3. Failure to conduct monthly SPCC inspections;**
- 4. Failure to maintain proper security lighting and locks on Above Ground Storage Tanks;**
- 5. Failure to obtain storm water management permits for construction projects which exceed 1 acre in size;**
- 6. Illegal discharge of hazardous waste D011 photographic waste waters to the sanitary sewer without permit;**
- 7. No secondary containment for used kitchen grease containers;**
- 8. No secondary containment for Above Ground Storage Tanks which store oil;**
- 9. Failure to label containers of used oil as “Used Oil”**

### **Clean Air Act Federal Violations**

- 1. Failure to obtain construction and operating permits for fuel burning sources such as boilers and emergency generators;**
- 2. Failure to determine in the air emission sources identified on campus exceed Title 5 thresholds for the criteria pollutants;**
- 3. Failure to maintain CFC licenses for on campus workers who recycle, collect, and regenerate CFC's from on site equipment;**

### **Community Right-to-Know or EPCRA Federal Violations**

- 1. Failure to evaluate the on site chemical inventories for exceedance of threshold of hazardous materials for quantities greater than 10,000 pounds, and Extremely Hazardous Substances in quantities greater than the 500 pound threshold;**
- 2. Failure to submit an annual Tier 2 report for chemicals exceeding these thresholds;**

### **Underground Storage Tank Registrations**

- 1. Failure to have tanks registered with State Tank Management Group;**
- 2. Failure to submit UST closure paperwork certifications or sampling reports;**
- 3. Failure to pay annual fees for installation of campus UST's**
- 4. Failure to upgrade campus UST's to 1998 standards by adding spill protection, overfill protection, or cathodic protection;**

### **Toxic Substance Control Act Federal Regulations**

- 1. Failure to perform survey of electrical transformers on campus (utility owned or campus owned) to determine if PCB content exceeds 50 parts per million;**
- 2. Failure to issue the EPA Lead Pamphlet to residents located in "target housing" which was constructed prior to 1978;**
- 3. Failure to label PCB Containing equipment with appropriate labels**