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MOST COMMON EPA VIOLATIONS AT UNIVERSITIES & COLLEGES

The Environmental Protection Agency (EPA) has increased enforcement activities at colleges and universities nationwide. Many institutions have received citations that have resulted in large fines. Below are a few of the most commonly cited EPA violations at academic institutions:

- Unlabeled waste containers
- Improperly labeled waste containers (abbreviations)
- Old, unusable chemicals stored in laboratories
- Open waste containers
- Failure to provide and document initial hazardous waste training
- Waste moved to an unapproved storage area (waste must be kept in a "satellite accumulation area at or near the point of waste generation")

For more information go to: http://www.epa.gov/ne/assistance/univ/rcra_vio.html

It is required by EPA regulations that anyone who generates, handles, stores or disposes of hazardous waste attends hazardous waste training annually. Hazardous waste includes: chemical waste, paints, solvents, used fluorescent tubes, batteries and computers.

<http://www.nyu.edu/environmental/services/training.shtml>

TIME TO UPDATE YOUR CHEMICAL INVENTORIES

It's that time of year again when NYU needs to report the names and quantities of all hazardous substances used or stored in any of its facilities, to the New York City Department of Environmental Protection and the Fire Department.

In order to facilitate the annual submission, Environmental Services requires that all areas that store or use hazardous substances maintain an up to date inventory of all such materials. The inventory must include:

- **Substance Name (and CAS# where available)**
- **Maximum Amount** stored during 2003
- **Units** (lb, g, kg, L, ml, gal, etc.), and
- **Location** (building name and room number).

A sample [Inventory](#) (which can be downloaded and used as a template) is available, along with additional information about this program, at <http://www.nyu.edu/environmental.services/RTK.shtml>. If you have any questions or need further assistance in completing your inventory, please contact Jane Woodcock at extension 81437.

EPA AUDIT POLICY AGREEMENT

NYU is set to sign a voluntary agreement with the EPA on February 12, 2004 that will go into effect on March 1, 2004. Under this agreement, NYU agrees to perform comprehensive environmental self-audits of almost all facilities at the Washington Square Campus, College of Dentistry and the NYU Medical Center - over the next three years. This audit will determine, among other things, whether: hazardous wastes and universal wastes generated at NYU are stored, treated, and disposed of correctly; above ground and underground storage tanks in operation are managed properly and others closed according to regulation; proper emissions controls are installed on boilers and operated correctly; all recent asbestos abatement was done appropriately; PCB-containing equipment has been managed properly; and that pesticides are used, stored, and disposed of safely. For more information on EPA's Voluntary Audit Policy go to: <http://www.epa.gov/region02/capp/cip/policy.htm>

The purpose of entering into this agreement with the EPA is to allow NYU the freedom to comply with the regulations through self-policing, discovery, disclosure, correction and prevention. Third-party auditors will be inspecting NYU facilities on a schedule set forth in the agreement and all findings will be disclosed to EPA. In return, EPA has agreed to forgo all, or a percentage, of the penalties that would be incurred from the violations as long as if the corrective actions satisfy the policy agreement. For more information on the audit agreement and a list of other schools that have signed up, go to: <http://www.epa.gov/region02/capp/cip/agreex.htm>

Environmental Services will continue to conduct internal compliance assessments of all facilities on a periodic basis. For further information on the issues we look for when conducting these assessments, please review the assessment questionnaires on our website:

<http://www.nyu.edu/environmental.services/audits.shtml>

Thank you for your help in keeping NYU in compliance.