

RCRA Inspection Report

1) Inspector and Author of Report

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U.S. Environmental Protection Agency, Region 4
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2) Facility Information

Amazon.com Services LLC Unis 335
335 Morgan Lakes Industrial Blvd.
Pooler, Georgia 31322
EPA ID No: GAR000091702

3) Responsible Officials

Nikki Crumity, Office Manager
Nikki.crumity@unisco.com

4) Inspection Participants

Kayla Acosta, US Environmental Protection Agency, Region 4
Dillon Long, Georgia Environmental Protection Division (GAEPD)
Nikki Crumity, Unis

5) Date of Inspection

April 7, 2022

6) Applicable Regulations

Resource Conservation and Recovery Act (RCRA) Sections 3002, 3005 and 3007 (42 U.S.C. §§ 6922, 6925 and 6927), and the regulations promulgated pursuant thereto at 40 Code of Federal Regulations (C.F.R.) Parts 260-270, 273 and 279.

As the State's authorized hazardous waste program operates in lieu of the federal RCRA program, the citations of those authorized provisions alleged herein will be to the authorized State program; however, for ease of reference, the federal citations will follow in brackets.

The Georgia Hazardous Waste Management Act, as amended, O.C.G.A. 12-8-60, et seq. as amended (Act); and Chapter 391-3-11 of the Georgia Rules for Hazardous Waste Management (Rules), and those portions of 40 CFR Parts 260-270, 273, and 279 that are adopted into the Rules by reference.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. §260.10], a Large Quantity Generator (LQG) is a generator who generates greater than or equal to 1,000 kilograms (2200 lbs) of non-acute hazardous waste in a calendar month.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.231], episodic event means an activity or activities, either planned or unplanned, that does not normally occur during generator operations, resulting in an increase in the generation of hazardous wastes that exceeds the calendar month quantity limits for the generator's usual category.

7) Purpose of Inspection

The purpose of this inspection was to conduct a compliance evaluation inspection (CEI) to determine Amazon.com Services LLC Unis 335's (hereinafter referenced as "Unis 335" or "the facility") in compliance with the applicable requirements of RCRA and the corresponding GAEPD regulations.

8) Previous Inspection History

This facility has never been inspected before by EPA or GAEPD.

9) Facility Description

Unis 335 has been operating at this location since 2018. Unis 335 operates on 600,000 sq. ft. Operations occur in a one-story building warehouse. The facility employs 50 workers and operates one shift: Monday-Friday (7:00am-4:00pm).

Amazon.com, on behalf of Unis 335 first notified the facility as a Large Quantity Generator (LQG) of hazardous waste on December 17, 2020. This notification is the most recent and only notification. Hazardous wastes identified in the report include the following EPA waste code: D001. The facility uses LED lighting and propane gas to power forklifts. The facility does not appear to generate universal waste. Unis 335 operates under the NAICS Code: 493110—General Warehousing and Storage.

Unis 335 is a storage warehouse that primarily operates as a receiving and drop-ship facility for ecommerce companies. Current customers at Unis 335 include Hyacinth Home, Schindler, Element, and Tuft Build. Currently, the facility does not handle products that are classified as hazardous materials. Unis 335 relies on their ecommerce customers to handle and contract a company for waste disposal services when a customer product at the Unis 335 facility is no longer wanted or the customer order has been cancelled.

Previously, Amazon.com was an ecommerce customer of Unis 320 and Unis 335 during the

pandemic. Amazon.com had made several large orders of alcohol and hand sanitizer products which were shipped to Unis 320 and Unis 335. Amazon.com decided to pull these products and cancel the orders. Since ecommerce customers are responsible for waste disposal of any unwanted products at Unis 335, Amazon.com contracted EQ Industrial Services (EPA ID MIK435642742) to properly dispose of the alcohol and hand sanitizer waste. Since Unis 335 was not registered as a generator of hazardous waste, Amazon.com registered this facility on Unis 335's behalf in order to get the one-time shipment of hazardous waste transported offsite.

Hazardous waste generated during this one-time event was sent to US Ecology Sulligent, Inc. (EPA ID ALD983177015) in Sulligent, Alabama. Hazardous waste generated at the facility primarily consisted of waste flammable liquids (EPA Waste Code D001), waste aerosols (EPA Waste Code D001) and waste hypochlorite solutions (EPA Waste Code D002).

Areas that were inspected include the following: Administrative Offices and the Main Warehouse itself.

10) **Opening Conference**

On April 7, 2022, EPA inspector Kayla Acosta accompanied by GAEPD inspector Dillon Long, arrived at Unis 335 at approximately 9:40 a.m. Mrs. Nikki Crumity, Office Manager and Mr. Curtis Crumity, Warehouse Manager received the inspectors. The inspectors introduced themselves, showed their credentials, and explained the purpose of the visit. The inspectors described the anticipated use of a digital camera during the inspection, and discussed the company's ability, pursuant to 40 C.F.R. § 2.203, to assert a business confidentiality claim for information submitted to EPA. The company did not assert a business confidentiality claim.

Mr. Crumity and Mrs. Crumity provided an overview of the facility's history and current operations during the opening conference. The company does not appear to meet the Small Business Regulatory Enforcement Fairness Act's classification of a "small business," which is generally set by the Small Business Administration using the business' SIC/NAICS code and annual receipts or number of employees. Therefore, the EPA inspectors did not provide a copy of the agency's information sheet for small businesses, which can be found at <https://www.epa.gov/sites/production/files/2017-06/documents/smallbusinessinfo.pdf>.

The inspection participants also discussed health and safety protocols and required personal protective equipment before Mr. Crumity led the inspectors on a tour of the Facility operations.

11) **Findings**

Administrative Offices:

The administrative offices are located on the southeast of the warehouse building. No hazardous waste was observed in this area.

Main Warehouse:

The rest of the warehouse building is used for ecommerce product storage. Products are received from the nearby port and stored at Unis 335 before drop-shipment to retailers. The inspectors

observed rows of products in closed cardboard boxes of varying sizes, all stacked on top of wooden pallets (Photos #1-3). Some boxes were shrink-wrapped together in groups while others were not. No hazardous waste was observed in the main warehouse.

Records Review

Disposal Records:

The facility had a one-time episodic generation event in December 2020 and therefore has only manifested one shipment of hazardous waste. The hazardous waste manifest and Land Disposal Restriction notification was not available for review by the generator (Unis 335).

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 CFR 262.232(a)(5)], The very small quantity generator must comply with the hazardous waste manifest provisions of subpart B of this part when it sends its episodic event hazardous waste off site to a designated facility, as defined in § 260.10 of this chapter.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.16 [40 CFR 268.7(a)(8)], generators must retain on-site a copy of all notices, certifications, waste analysis data, and other documentation produced pursuant to this section for at least three years from the date that the waste that is the subject of such documentation was last sent to on-site or off-site treatment, storage, or disposal. The three year record retention period is automatically extended during the course of any unresolved enforcement action regarding the regulated activity or as requested by the Administrator. The requirements of this paragraph apply to solid wastes even when the hazardous characteristic is removed prior to disposal, or when the waste is excluded from the definition of hazardous or solid waste under 40 CFR 261.2 through 261.6, or exempted from Subtitle C regulation, subsequent to the point of generation.

Based on the copy of the final signed manifest obtained from the e-manifest system through RCRAInfo, the facility appears to have generated a LQG amount (greater than 2,200 lbs of non-acute hazardous waste) during the episodic event.

Manifest Tracking Number	Waste Description	Amount of Waste
021270145JJK	Waste Hypochlorite Solutions	65 lbs
	Waste Flammable Liquids	1,945 lbs
	Waste Hypochlorite Solutions	250 lbs
	Waste Aerosols	65 lbs

Records required to be maintained by a LQG of hazardous waste such as a biennial report (for the episodic LQG event), hazardous waste training, a contingency plan, waste minimization plan, or weekly container inspections in a 90-day central accumulation area were not available for review.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 CFR 262.41], A generator who is a large quantity generator for at least one month of an odd-numbered year (reporting year)

who ships any hazardous waste off-site to a treatment, storage or disposal facility within the United States must complete and submit EPA Form 8700-13 A/B to the Regional Administrator by March 1 of the following even-numbered year and must cover generator activities during the previous year.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 CFR 262.17(a)(7)(i)(A)], facility personnel must successfully complete a program of classroom instruction, online training (e.g., computer-based or electronic), or on-the-job training that teaches them to perform their duties in a way that ensures compliance with this part. The large quantity generator must ensure that this program includes all the elements described in the document required under paragraph (a)(7)(iv) of this section.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 CFR 262.260(a)], a large quantity generator must have a contingency plan for the facility. The contingency plan must be designed to minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 CFR 262.17(a)(1)(v)], at least weekly, the large quantity generator must inspect central accumulation areas. The large quantity generator must look for leaking containers and for deterioration of containers caused by corrosion or other factors. See paragraph (a)(1)(ii) of this section for remedial action required if deterioration or leaks are detected.

12) Closing Conference

An exit meeting was held at the end of the inspection with Mr. Crumity and Mrs. Crumity to discuss preliminary conclusions and to go over the findings. Currently, the facility does not appear to be a LQG of hazardous waste. It appears that hazardous waste generation occurred during a one-time episodic event. If hazardous waste generation was a one-time event and the facility does not believe it will be generating hazardous waste in the future, it should renotify GAEPD that the facility is no longer a generator of hazardous waste. Alternatively, the facility may choose to keep its generator status as a LQG and be subject to all LQG regulatory requirements under 40 CFR 262.17.

13) Inspection Findings

Based on the observations made during the inspection, Unis 335 was apparently deficient with the following RCRA requirements:

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 CFR 262.17(a)(1)(v)], at least weekly, the large quantity generator must inspect central accumulation areas. The large quantity generator must look for leaking containers and for deterioration of containers caused by corrosion or other factors. See paragraph (a)(1)(ii) of this section for remedial action required if deterioration or leaks are detected.

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14) List of Appendices

Appendix 1 – Photo Log:

{3} Photos taken on: [04/07/2022]

Photos taken by: Dillon Long

Photos taken with: GAEPD Mobile Device

15) **Signed**

KAYLA
ACOSTA

Digitally signed by KAYLA
ACOSTA
Date: 2022.05.26 16:31:25
-04'00'

Kayla Acosta
Enforcement and Compliance Specialist

Date

Concurrence

ARACELI
CHAVEZ

Digitally signed by ARACELI
CHAVEZ
Date: 2022.05.27 09:28:51
-04'00'

Araceli Chavez
Chief
RCRA Enforcement Section

Date



Photo 1: Main Warehouse (Product Storage). No hazardous waste was observed.



Photo 2: Main Warehouse (Product Storage). No hazardous waste was observed.



Photo 3: Main Warehouse (Product Storage). No hazardous waste was observed.