

RCRA Inspection Report

1) Inspectors and Authors of the Report

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2) Facility Information

United Parcel Service–Centennial Hub
8100 Air Commerce Drive
Louisville, Kentucky 40219
EPA ID # KYR000047613
Primary NAICS: 49221–Local Messengers and Local Delivery
Other NAICS: 492110 Couriers and Express Delivery Services

3) Responsible Official

Ms. Brandi Gee
Facility Engineer
brgee@ups.com

4) Inspection Participants

Ms. Brandi Gee, United Parcel Service, Facility Engineer
Ms. Nancy Goldsborough, UPS Full Time Preloading Supervisor
Ms. Leslie Carr, Kentucky Division of Waste Management, Inspector
Ms. Denise Dzurenka, Kentucky Division of Waste Management, Inspector
Mr. David Champagne, U.S. EPA, Region 4, Inspector

5) Date of Inspection

May 10, 2022, 09:00 hours

6) Applicable Regulations

Sections 3002, 3005 and 3007 of Resource Conservation and Recovery Act (RCRA)
40 Code of Federal Regulations (C.F.R). Parts 260 through 268, 270, 273 and 279
Rules Governing Hazardous Waste Management Title 401 of Kentucky Administrative
Regulations (401 K.A.R.) Chapters 30 through 40 and 44.

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Pursuant to 401 KAR 39:080 Section 1 [40 C.F.R. § 262.17], an LQG may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by KRS 224.46-520(1) [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in 401 KAR 39:080 Section 1 [40 C.F.R. § 262.17] (hereinafter referred to as the “LQG Permit Exemption”).

Pursuant to 401 KAR 39:080 Section 1 [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of non-acute hazardous waste in containers at or near the point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or without having interim status, as required by KRS 224.46-520(1) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with 401 KAR 39:080 Section 1 [40 C.F.R. § 262.16(b) or §262.17(a)], except as required in [401 KAR 39:080 Section 1 [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in 401 KAR 39:080 Section 1 [40 C.F.R. § 262.15(a)] (hereinafter referred to as the “SAA Permit Exemption”).

Pursuant to 401 KAR 39:080, Sections 3(1) [40 C.F.R. § 273.9], a “Small Quantity Handler of Universal Waste” (SQHUW) is a Universal Waste handler who does not accumulate 5,000 kilograms or more of Universal Waste (batteries, pesticides, mercury-containing equipment, or lamps, calculated collectively) at any time.

7) Purpose of Inspection

The purpose of the inspection was to conduct an unannounced hazardous waste compliance evaluation inspection (CEI) to determine the facility’s compliance with applicable RCRA regulations.

8) Facility Description

The United Parcel Service–Centennial Hub (UPS or facility) is located at 8100 Air Commerce Drive in Louisville, Kentucky. The most recent Hazardous Waste Generator Notification (EPA Form 8700-12) dated March 31, 2022, characterized the facility as a large quantity generator (LQG) of hazardous waste. UPS receives and ships commercial and residential packages in an approximate 1.1 million square foot building. According to RCRAInfo, generator waste codes reported by the facility for federally regulated hazardous wastes consist of the following:

- D001, D002, D003, D005, D008, D018, D019, D021, D028, D029, D039, D040
- F003
- P030
- U002, U122, U154, U220, U239

UPS began operating in 2009 and operates 24 hours a day Monday through Thursday and Saturday, with half days on Friday and Sunday. There are approximately 1,000 employees operating three (3) shifts starting at 02:00, 11:00, 17:00 hours.

9) Previous Inspection/Compliance History

UPS had a RCRA Compliance Evaluation Inspection in November 2017, June 2016, and June 2013. No violations were found in any of the previous 3 inspections.

10) Findings

Opening Conference

On May 10, 2022, David Champagne, EPA Inspector, and the inspectors from Kentucky Department of Waste Management, conducted an unannounced RCRA Compliance Evaluation Inspection (CEI) at UPS. The inspection team was greeted by the facility's security team where credentials were shown, and the purpose of the inspection was explained. Cell phone international mobile equipment identity (IMEI) numbers were requested but the inspection team refused this request. The inspectors walked through a metal detector prior to entering the facility. The inspectors met with Anne Schweitzer, Facility Engineer before being introduced to Brandi Gee, Facility Engineer who would be the facility escort. The purpose of the inspection was explained to Ms. Gee and credentials were presented to the facility team. The inspectors described the possible use of a digital camera during the inspection and the facility's ability, pursuant to 40 C.F.R. §2.203, to assert a business confidentiality claim (CBI) for information submitted to the EPA. The facility provided the inspection team with a CBI declaration document. It was understood by the EPA that CBI consisted of commercial and residential customer information and conveyor belt process design; neither of which the EPA was required to document for inspection purposes.

Hub

The main processing floor consists of various conveyor belts that move packages through the building where packages can be identified and organized for transportation. During this screening process, some packages may be damaged or become damaged by getting jammed in the conveyor system. Ms. Nancy Goldsborough, Preload Supervisor, manages the main observation station. When a spill is identified, employees on duty will radio control for a responder. Based on a contractor's classifications of waste, the response team will make a waste determination and dispose of the waste. Located in this observation station are stored batteries that are shipped to East Penn Recycle Services. Adjacent to this station in a satellite accumulation area for hazardous waste generated from damaged material.

At the time of the inspection, there was a 55-gallon container labeled hazardous waste paint debris, EPA waste codes D001 and D035, labeled with indication of the hazardous contents of the container, and closed. A second hazardous waste container managing approximately 35-gallons of hazardous waste paint was labeled hazardous waste, labeled with indication of the hazardous contents of the container, and with EPA waste codes D001, D005, D035 and F003. Universal waste lamps are also managed in this area and were closed, labeled, and dated April 22, 2022.

Central Accumulation Area

The 90-day Central Accumulation Area (CAA) is located outside the building across from the main hub observation area and SAA. At the time of the inspection the facility was managing EPA waste codes D001, D002, D035, and U056. These wastes were generated from accidental breakage and spillage of commercial or residential products being processed through the facility. At the time of the inspection, there were approximately thirty (30) 55-gallon containers of

hazardous waste staged inside and outside of a storage building. This area is surrounded by a security fence and well within the property boundaries. All containers were labeled hazardous waste, labeled with the indication of the hazardous contents, and closed. The oldest date on the containers was February 11, 2022.

Auto Shop

The auto shop conducts maintenance on company vehicles and generates used oil and used oil filters. Additionally, the facility shop generates universal waste aerosol cans. At the time of the inspection all used oil containers were labeled. Two (2) 55-gallon containers of aerosol cans were labeled, closed, and dated March 17, 2022. The facility also utilizes a solvent parts washer that is serviced by Safety Kleen.

Trailer Shop

This area of the facility contains a 35-gallon container to manage used oil. This container was labeled.

Records

Universal waste lamps are shipped to LampTracker, aerosol cans are managed by Veolia, used oil is managed by Safety Kleen, and used batteries are managed by East Penn Recycle Services and Interstate. Manifests were reviewed and the facility utilizes the following transporters and designated facility.

Transporters:

Veolia ES Technical Solutions EPA ID: NJD080631369

Basin Transportation EPA ID: OKR000031492

Designated Facility:

Veolia ES Technical Solutions EPA ID: OHD093945293

Personnel training records for all employees that manage hazardous waste were provided. At the time of the inspection, the inspection team reviewed the contingency plan dated August 2, 2021 was up-to-date. Job descriptions, a Quick Reference Guide, and notifications to local authorities were provided.

11. Summary

The inspectors conducted the exit meeting with facility team presenting the preliminary results of the inspection. UPS was inspected as a large quantity generator of hazardous waste and appeared to be in compliance with RCRA at the time of the inspection.

12) Signed

DAVID

CHAMPAGNE

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CHAMPAGNE
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David Champagne

Physical Scientist

Date

13) Concurrence

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CHAVEZ**

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Araceli B. Chavez
Chief
RCRA Enforcement Section

Date