

REGION 10 Enforcement Division

INSPECTION REPORT

Inspection Date(s):	03/09/2022 - 03/09/2022		Announced: No
Time:	Entry: 09:27 AM (PT)	Exit: 02:01 PM (PT)	
Program:	RCRA		
Regulatory Program(s):	Title 40 - ENVIRONMENTAL PROTECTION AGENCY; WASHINGTON STATE REGULATIONS		
If Access is Denied:			
Company Name:	United States Postal Service (USPS)		
Facility or Site Name:	USPS Seattle Network Distribution Center (NDC)		
Facility/Site Physical Address:	34301 9th Avenue S.		
(City, state, zip code)	Federal Way, WA 98003		
Type of Operation:	Bulk Mail Distribution Facility		
Size of Facility:	2,396,000 sq ft.		
Length of Facility at Location:	Since 1975		
Geographic Coordinates:	47.29605, -122.32203		
Mailing address: (Secondary Address)	Mr. James Schiller, Maintenance Manager james.c.schiller@usps.gov 34301 9th Avenue S. Federal Way, WA 98003 (253) 874-7240 CC: Mr. James Gibson, Manager of Maintenance Support (253) 874-7263 james.a.gibson@usps.gov Mr. Sydney Randell, USPS Environmental Compliance Specialist (425) 438-2122 sydney.c.randell@usps.gov		
(City, state, zip code)	Federal Way, WA 98003		
County:	King		
Facility/Site Identifier:	WA6180090056		
Media Number:	N/A		
NAICS:	491110 – Postal Service		
Lead Inspector:			
Jon Jones			
	REGION 10	Jones.Jon@epa.gov	(907) 271-6329
Supervisor Review:			
Jen Sullivan			
	REGION 10	Sullivan.Jennifer.A@epa.gov	(206) 553-6978

SECTION I – INTRODUCTION**Purpose of the Inspection/Objective**

Type of inspection: CEI - Compliance Evaluation Inspection

This was a Resource Conservation and Recovery Act (RCRA) inspection. The purpose of the inspection was to support EPA's evaluation of compliance with the standards for management of hazardous waste, universal waste and used oil pursuant to the regulations found in 40 C.F.R. Parts 262 through 273 and 279 and the State of Washington's federally authorized RCRA regulations found at WAC 173-303. The inspection was conducted as a Core Program Requirement for FY 2022.

Attendees

Title	Name	Phone	Email	Present in Opening Conf.	Present in Closing Conf.
Lead Inspector	Jon Jones	(907) 271-6329	Jones.Jon@epa.gov	Yes	Yes
RCRA Compliance Officer	Matt Quarterman	(206) 553-2146	quarterman.matthew@epa.gov	Yes	Yes
Hazardous Waste Compliance Inspector	Brittany McManus	(206) 594-0057	mcb461@ecy.wa.gov	Yes	Yes
Manager of Maintenance Support	James Gibson	(253) 874-7263	james.a.gibson@usps.gov	Yes	Yes
Maintenance Manager	James Schiller	(253) 874-7240	james.c.schiller@usps.gov	No	Yes

Opening Conference

EPA Lead Inspector Jon Jones arrived at the USPS Seattle Network Distribution Center (NDC) at 09:27 AM (PT) on 03/09/2022 for an inspection. I presented my credentials to James Schiller, Maintenance Manager and informed him that this was an EPA RCRA inspection. The table above presents all the opening and closing conference inspection participants. The Inspection Team included Mr. Matt Quarterman, EPA and Ms. Brittany McManus, WA Department of Ecology.

Facility/Site Description

USPS Seattle NDC is a bulk mail distribution facility in Federal Way, WA. The facility processes bulk mail for the greater Seattle area at this site. There is also an auxiliary Vehicle Maintenance Facility (VMF) located on this site.

Facility Info

Number of employees	Approximately 500
Weather Conditions	Sunny and cool
Operating Hours	24/7/365 with three shifts

Safety Training Provided to Inspector(s)?	No
What type of generator facility notified?	VSQG
What type of generator facility verified as?	Unknown based on findings of inspection

Process Description

Mr. Gibson invited us into a small breakroom area while he canceled his meetings for the day. After returning to the breakroom, we held an opening conference. During the opening conference, Mr. Gibson told us that his facility generated the following wastes:

- Used oil
- Laundered rags
- Used antifreeze
- Fluorescent lamps and batteries that are managed as universal waste.
- Damaged items in shipment that the facility refers to as "Loose in the mail."
- Parts washer solvent generated in the Vehicle Maintenance Facility (VMF) and managed as hazardous waste.
- Aerosols managed as hazardous waste

During the inspection of the facility on March 9, 2022, we were accompanied by Mr. Gibson.

During the inspection we looked at the facility's processes, in addition to hazardous waste management practices, generation points, and accumulation areas. We looked for wastes that facility representatives had not yet identified or designated as hazardous. We also observed the facility's universal waste and used oil management. Specifically, we inspected the following areas of the facility listed below.

Building(s)

Building/Area/Sub-area	Process Description	Area of Concern
Custodial Shop	Stopped using as UW accumulation area a few years ago.	No
Lubrication Shed	Central Accumulation Area (CAA)	Yes
Over the Road (OTR) Shed	Misc Supply staging and storage area.	Yes
Area west of the OTR Shed	Adjacent to the service road	Yes
Seattle NDC (Network Distribution Center)	Room 133A is the location for the accumulation of Universal Waste (UW).	Yes
Room 133A	Maintenance Stock Room serving as the accumulation area for UW lamps and batteries.	Yes
Loose in the Mail Area		Yes
Maintenance Lube Area	Accumulation of used oil and spent antifreeze.	Yes
South Side of Seattle NDC Building		Yes
Vehicle Maintenance Facility (VMF)	Generation/accumulation of used oil and spent antifreeze.	No

SECTION II – OBSERVATIONS AND RECORDS REVIEW**Observations**

Building: Lubrication Shed	Contains CBI: No
Observation #: JJ1-OB-005	Date: 03/09/2022
As we entered the Lubrication Shed, we saw an abundance of what Mr. Gibson said was “Loose-in-the-mail” waste. Mr. Gibson described how packages that break open, spill, and are otherwise unable to continue to their destination are examples of “Loose-in-the-mail” wastes. According to Mr. Gibson, some of the “Loose-in-the-mail” waste had already been designated by USPS personnel and some was waiting on Clean Harbors/Safety Kleen for designation which seemed consistent with a sign I observed in this area that read, “ 5-13-2020 ‘Do Not Remove’ Clean Harbors has not yet went through this dead mail. Thank you, James Gibson”. The “Loose-in-the-mail” waste that had been designated by USPS personnel was either marked with a fluorescent green label which indicated that it had been designated as non-hazardous/non-regulated or a fluorescent pink label which indicated that it had been designated as hazardous waste. During the inspection, I saw that none of the “Loose-in-the-mail” wastes that had been designated as hazardous waste were marked with hazard indicators. Additionally, it was unclear what sort of process USPS personnel were following for waste designation, or training USPS personnel received that qualified them to make these determinations. According to Mr. Gibson, the Lubrication Shed was the facility’s Central Accumulation Area (CAA). At the time of the inspection, the “Loose-in-the-mail” wastes were in flat tubs (routinely used at the USPS to transport flat mail, i.e., letters, post cards, etc.) and these flat tubs were in three, wheeled mail carts, two flammable storage cabinets and inside of a caged area on four, wheeled metal carts as well as on the floor around those carts. I asked Mr. Gibson how long the waste in the Lubrication Shed had been accumulated. Mr. Gibson said the last shipment by a waste vendor was sometime early in 2020. Mr. Gibson explained after the last RCRA inspection conducted by WA Department of Ecology in 2019, arrangements were made for a waste vendor to come out and designate everything in the Lube Shed and ship it off site. He said it took three people two days to go through all of the accumulated waste back then. I asked for copies of any documentation such as hazardous waste manifests and profiles related to this event be provided after the inspection and Mr. Gibson agreed. There was also a clear plastic trash bag that was full of approximately 40 to 50 waste aerosols. At the time of the inspection, this trash bag was not labeled with the words, “Hazardous Waste” or “Dangerous Waste” and was not marked with a hazard indicator. During the last inspection, it was noted that the facility used an aerosol puncturing unit. Mr. Gibson told us that since the last inspection they decided to remove the puncturing unit and ship the waste aerosol cans unpunctured. We also saw 12, 55-gallon containers and one 25-gallon blue poly container that were staged approximately in the center of the Lubrication Shed. At the time of the inspection, we saw that two of the 12, 55-gallon containers were labeled as containing “Oil-Soaked Rags.” These two containers were not labeled with the words “Used Oil.” I explained to Mr. Gibson that oil-soaked rags would more than likely contain some used oil as a free liquid in the container and would be required to be labeled with the words “Used Oil.” The remaining ten 55-gallon containers, along with the 25-gallon blue poly container, were either unlabeled or labeled as “Mitigated Waste” and Mr. Gibson was unable to tell us what these containers held. During the inspection, I asked Mr. Gibson to provide me with an inventory of the “Loose-in-the-mail” wastes as well as an inventory of the containers that were staged in the center of the Lubrication Shed. On March 15, 2022, I sent an email to Messrs. Schiller and Gibson which listed the areas of concern and follow-up items identified during the inspection. In that email, I asked for an inventory of the waste that was observed inside	

the Lubrication Shed to include:

- The 12, 55-gallon containers and one 25-gallon blue, poly container.
- The “Loose-In-The-Mail” items inside and outside of the caged area, as well as inside the flammable storage cabinets.
- List the following information in your facility’s inventory:
 - Product Name
 - # of containers
 - Size of container
 - Approximate volume remaining in container (i.e., Full, $\frac{3}{4}$ full, half-full,...)
 - Liquid/Solid
 - Waste designation (HW, Non-Reg)
 - Safety Data Sheet for each product inventoried.

Following the inspection, Mr. Gibson sent multiple emails to me on March 29 and 30, 2022. The information sent by Mr. Gibson included just a portion of the requested information and was not complete. The information received did not include a complete inventory of the “Loose-in-the-mail” wastes observed in the Lubrication shed and the inventory received also didn’t include all the requested information. There was also no inventory of the 25-gallon or 55-gallon containers. In Mr. Gibson’s email with attached Lubrication shed inventory he stated, “Attached is the inventory. I will ensure the data is input using an excel spreadsheet as well.” A copy of this spreadsheet had not been received at the time this inspection report was written.

Photo(s)

1. [IMG-2022030911132813281155887.jpg](#)
2. [IMG-2022030911133913391034403.jpg](#)
3. [IMG-202203091113481348850894.jpg](#)
4. [IMG-2022030911135813581042537.jpg](#)
5. [IMG-202203091114561456804231.jpg](#)
6. [IMG-202203091115421542665058.jpg](#)
7. [IMG-202203091117071771165145.jpg](#)
8. [IMG-2022030911174517451111773.jpg](#)
9. [IMG-202203091119351935993065.jpg](#)
10. [IMG-2022030911195019501000045.jpg](#)
11. [IMG-20220309112107217177696.jpg](#)
12. [IMG-202203091121132113204712.jpg](#)
13. [IMG-202203091121202120194332.jpg](#)
14. [IMG-202203091121262126243966.jpg](#)
15. [IMG-202203091121432143168127.jpg](#)
16. [IMG-202203091121482148222050.jpg](#)
17. [IMG-20220309112200220164048.jpg](#)
18. [IMG-20220309112208228198009.jpg](#)
19. [IMG-202203091125382538195762.jpg](#)
20. [IMG-202203091125442544123159.jpg](#)
21. [IMG-202203091125532553123024.jpg](#)
22. [IMG-202203091128532853270838.jpg](#)
23. [IMG-20220309112904294246570.jpg](#)
24. [IMG-202203091129182918260276.jpg](#)
25. [IMG-202203091132303230201617.jpg](#)
26. [IMG-202203091132373237212349.jpg](#)
27. [IMG-202203091132463246211562.jpg](#)

Building: Over the Road (OTR) Shed**Contains CBI:** No**Observation #:** JJ1-OB-002**Date:** 03/09/2022

The OTR Shed is a large, covered area with three sides that is open on one side. On the outer edge of the OTR Shed we saw a 5-gallon container of solvent-based white traffic paint that was sitting outside. I asked Mr. Gibson if the winter temperatures had gotten below freezing and if the container of traffic paint had been outside this past winter. Mr. Gibson stated that the winter temperatures had been below freezing and that the container of traffic paint had been outside over the previous winter. I told Mr. Gibson that if the traffic paint had been allowed to freeze and thaw one or more times that it may no longer be viable. I told him that he should make a waste designation for the traffic paint. I requested a Safety Data Sheet (SDS) for the traffic paint and Mr. Gibson sent one to me following the inspection. According to the SDS, the white traffic paint has a flash point of -4°F (Ignitability - D001) and it contains between 2.5-10% by weight of Methyl Ethyl Ketone (MEK) (Toxicity - D035). There has been no response from the facility regarding a waste determination for the White Traffic Paint at the time this report was written.

We also saw some batteries that were in the OTR shed. I asked if the batteries were waste batteries and according to Mr. Gibson, the batteries were waste batteries that should be managed as universal waste. There

were a total of 17 waste batteries (Pb) and at the time of the inspection these batteries were not labeled as either "Universal Waste – Batteries", "Waste – Batteries", or "Used Batteries" and there was no indication as to how long these waste batteries had been on-site. There has been no response from the facility regarding the batteries at the time this report was written.

Photo(s)

1. [IMG-20220309095708578210104.jpg](#)
2. [IMG-2022030909574157411194180.jpg](#)
3. [IMG-202203090958045841071168.jpg](#)
4. [IMG-2022030910040242247020.jpg](#)
5. [IMG-2022030910040848270084.jpg](#)
6. [IMG-20220309100418418178931.jpg](#)
7. [IMG-20220309100425425273172.jpg](#)

Building: OTR Shed/Area West of the OTR Shed**Contains CBI:** No**Observation #:** JJ1-OB-003**Date:** 03/09/2022

West of the OTR Shed and adjacent an aircraft cargo container, we saw a 5-gallon container of solvent-based yellow traffic paint that was next to an outdoor light pole. The bottom portion of the light pole was concrete and had been painted yellow. The yellow paint on the concrete base of the light pole was faded and chipping and I asked Mr. Gibson if the container of yellow traffic paint had been sitting outside since the last time the concrete base had been painted and he said that it could have, and probably had been, but didn't know how long that it had been there. I told Mr. Gibson that he should also conduct waste designation on the yellow traffic paint since it had been outside and allowed to freeze and thaw over the previous winter.

I requested an SDS for the yellow traffic paint and Mr. Gibson sent one to me following the inspection. According to the SDS, the yellow traffic paint has a flash point of -4°F (Ignitability - D001) and it contains between 2.5-10% by weight of Methyl Ethyl Ketone (MEK) (Toxicity - D035). There has been no response from the facility regarding waste designation for the White Traffic Paint at the time this report was written.

While still in the area, I also inspected the contents of the aircraft cargo container. Upon entering the cargo container, I saw a paint sprayer and several 5-gallon containers of paint. According to Mr. Gibson, this cargo container was being used as a paint storage area. The cargo container did not have adequate head room and it didn't have much room to walk around in and was difficult to navigate through, however while inside the cargo container I saw that most of the 5-gallon containers held various colors of the same type of traffic paint that we had seen earlier during the inspection. The colors I saw included white, yellow, black, and blue. There was also a 5-gallon container that held an unknown liquid as well as a box that held several aerosols. I shook several of the aerosols to determine the content amount and they appeared to be old and inherently waste-like.

The aircraft cargo container is not heated and the paint freezes and thaws over the winter months. While inside the cargo container, I saw that most of the lids on the containers of paint were not completely closed, as the tabs on the lids had been left in the pried-open position. I lifted the lids on several of the containers and saw that the paint had been allowed to dry out in the container. During the inspection, I requested an SDS for the traffic paints inside the cargo container and Mr. Gibson sent me SDSs for white, yellow, black, red, and blue solvent-based traffic paints following the inspection. According to the SDSs, the traffic paint has a flash point of -4°F (Ignitability - D001) and it contains between 2.5-10% by weight of Methyl Ethyl Ketone (MEK) (Toxicity - D035). There has been no response from the facility regarding waste designation for the traffic paint at the time this report was written.

Prior to leaving the area, I went inside of another adjacent aircraft cargo container. While inside the cargo

container I saw a container of floor adhesive. This cargo container was not a heated container and I told Mr. Gibson that he should probably make a waste designation for the adhesive as it may no longer be good product. I requested an SDS for the floor adhesive in adjacent aircraft storage container. There has been no response from the facility regarding either a waste designation or an SDS for the floor adhesive at the time this report was written.

I told Mr. Gibson that I would be requesting an inventory of the contents of the paint storage cargo container as a follow-up item. On March 15, 2022, I sent an email to Messrs. Schiller and Gibson which listed the areas of concern and follow-up items identified during the inspection. In that email I requested the following:

Inventory of the waste solvent-based traffic paint and aerosols that were observed inside the aircraft cargo bin south of the SNDC and West of the OTR Shed.

- List the following information in your facility's inventory:
 - Product Name
 - # of containers
 - Size of container
 - Approximate volume remaining in container (i.e., Full, ¾ full, half-full,...)
 - Liquid/Solid
 - Waste designation (HW, Non-Regulated)
- Please include a Safety Data Sheet for each product inventoried.

Please ensure that the two, 5-gallon containers of traffic paint we observed outside the OTR Shed (white traffic paint) and adjacent to the aircraft cargo bin (yellow traffic paint) are included in the inventory.

There has been no response from the facility regarding this request at the time this report was written.

Photo(s)

1. [IMG-202203091010351035226715.jpg](#)
2. [IMG-202203091010451045280255.jpg](#)
3. [IMG-202203091010511051302794.jpg](#)
4. [IMG-2022030910245524551040579.jpg](#)
5. [IMG-202203091025022521140670.jpg](#)
6. [IMG-2022030910251225121195899.jpg](#)
7. [IMG-202203091031213121976396.jpg](#)
8. [IMG-202203091036163616226746.jpg](#)
9. [IMG-202203091036283628231323.jpg](#)

Building: Seattle NDC (Network Distribution Center)/Room 133A

Contains CBI: No

Observation #: JJ1-OB-001

Date: 03/09/2022

While in Room 133A we saw two separate areas where the facility was accumulating universal waste. The first area we inspected was where the facility was accumulating waste fluorescent and waste LED lamps. There were a total of eight cardboard boxes that contained an assortment of waste lamps that varied in size from two-foot lamps to four-foot lamps. At the time of the inspection, we saw that all eight boxes of waste lamps were not closed. We saw four of the eight boxes of waste lamps were not labeled as either "Universal Waste – Lamps," "Waste – Lamps," or "Used Lamps." We also saw that one of the boxes of waste lamps which was labeled as "Universal Waste – Lamps" was dated 2/2/2020, indicating that the lamps had been in accumulation for greater than two years.

There was also a container that appeared to be a little larger than 5-gallons in size that contained broken

lamps. The container was labeled as universal waste and was dated 6/9/2021.

Prior to leaving the area, I explained the labeling, container, and accumulation requirements for universal waste lamps to Mr. Gibson. Additionally, in this area I observed a sign directly above the containers of universal waste that described proper procedures for the management of universal waste.

We then went to the other area of Room 133A where the facility was accumulating waste batteries that were being managed as universal waste. There was a mix of batteries being accumulated in this location that included Lead-acid, Ni-Cad, and Lithium-ion. During the inspection, we saw the following:

- Two small flat tubs that contained a mix of batteries (Lead-acid, Ni-Cad, and Lithium-ion) that were not labeled as "Universal Waste – Batteries," "Waste Batteries," or "Used Batteries."
- 6 loose lead-acid batteries that are not labeled as "Universal Waste – Batteries," "Waste Batteries," or "Used Batteries."

There was another container that was a little larger than a 5-gallon container that held four non-PCB ballasts. The container was labeled as Universal Waste and dated 4/17/2020. I looked at the ballasts and did not see any indication that they contained a battery.

There has been no response from the facility regarding any corrective action taken with either the waste lamps or batteries at the time this report was written.

Photo(s)

1. [IMG-202203090913511351929676.jpg](#)
2. [IMG-202203090914111411852883.jpg](#)
3. [IMG-202203090914321432707731.jpg](#)
4. [IMG-202203090914531453169634.jpg](#)
5. [IMG-202203090914591459160096.jpg](#)
6. [IMG-202203090915291529107783.jpg](#)
7. [IMG-202203090915351535185647.jpg](#)
8. [IMG-202203090915481548200046.jpg](#)
9. [IMG-20220309091605165140849.jpg](#)
10. [IMG-202203090916391639147324.jpg](#)
11. [IMG-202203090922402240172032.jpg](#)
12. [IMG-20220309092307237128382.jpg](#)
13. [IMG-202203090923192319179872.jpg](#)
14. [IMG-202203090939143914178511.jpg](#)
15. [IMG-202203090939233923173254.jpg](#)
16. [IMG-202203090939363936194058.jpg](#)
17. [IMG-202203090939473947172316.jpg](#)
18. [IMG-202203090939573957186637.jpg](#)
19. [IMG-202203090944354435177924.jpg](#)
20. [IMG-202203090944444444136942.jpg](#)
21. [IMG-202203090944514451100827.jpg](#)

Building: Seattle NDC (Network Distribution Center)/Loose in the Mail

Contains CBI: No	
Observation #: JJ1-OB-006	Date: 03/09/2022
During the inspection, we went to an area inside the Seattle NDC that Mr. Gibson told us about, where facility personnel managed items that had been damaged in the mail system. According to Mr. Gibson, there was a process in which the shipper had to be notified of the damaged item to determine whether the shipper wanted the damaged item returned to them or if they wanted the USPS to manage the item for disposal. Items marked for disposal were deemed as "Loose-in-the-mail" and either designated as hazardous waste/dangerous waste or non-regulated waste by USPS personnel and taken to the Lubrication Shed or Clean Harbors/Safety Kleen personnel would be brought in to designate the waste after it had been taken to the Lubrication Shed. I asked if there was a written process for taking wastes out to the Lubrication Shed that could be provided. Mr. Gibson told me once space became too limited inside the caged area, carts of waste would be taken to the Lubrication Shed. He told me there wasn't a written procedure for how this happened. At the time of the inspection, we saw an abundance of damaged items in flat tubs that were on large rolling metal carts inside of a large, caged area. While in the caged area, we saw two large, flammable storage cabinets. One of the storage cabinets was marked with a sign that was labeled, "ITEMS FOR DISPOSAL ONLY." The cabinet held several flat tubs which contained damaged items as well as aerosols and small gas cylinders. The second flammable storage cabinet contained two flat tubs, one marked with a fluorescent pink tag indicating that it had been designated as "Hazardous Waste" and the other did not have a visible tag marking. As we exited the caged area, we saw two vent hoods that were completely stuffed with flat tubs that contained "Loose-in-the-mail" wastes. Just across from the vent hoods, we saw some additional carts that were full of "Loose-in-the-mail" wastes in clear plastic bags and flat tubs. We also noticed that several of the bagged wastes were leaking onto the floor. At the time of the inspection, none of the "Loose-in-the-mail" wastes that we saw in the caged area, flammable storage cabinets, vent hoods and on carts that appeared to be designated as "Hazardous Waste" were marked with hazard indicators. I told Mr. Gibson that I wanted to get an inventory of the "Loose-in-the-mail" wastes we observed in the area as well as a written copy of the facility's procedures or standard operating procedure for the management of "Loose-in-the-mail" waste, along with any training USPS personnel receive that qualifies them to make waste designations. On March 15, 2022, I sent an email to Messrs. Schiller and Gibson which listed the areas of concern and follow-up items identified during the inspection. In that email I requested the following: Inventory of the waste that was observed inside the SNDC "Loose-in-the-mail" Area to include: • The "Loose-in-the-mail" items in the back caged area, the flammable storage cabinets, the vent hood type storage areas, and the "Loose-in-the-mail" items on the orange carts that were outside the caged area on the day of the inspection. • List the following information in your facility's inventory: ○ Product Name ○ # of containers ○ Size of container ○ Approximate volume remaining in container (i.e., Full, ¾ full, half-full,...) ○ Liquid/Solid ○ Waste designation (HW, Non-Reg) • Please include a Safety Data Sheet for each product inventoried. • Training records for facility personnel that manage universal waste and personnel that designate	

those items managed as "Loose-in-the-Mail."

- Any written "Loose-in-the-Mail" procedures outlining steps to take when packages are damaged in transit, including timelines, incident tracking, and waste designation procedures.

Following the inspection, Mr. Gibson sent multiple emails to me on March 29 and 30, 2022. The information sent by Mr. Gibson included just a portion of the requested information and was not complete. The information received from Mr. Gibson did not include any of the information listed above. There has been no response from the facility regarding this request at the time this report was written.

Photo(s)

1. [IMG-202203091159565956233388.jpg](#)
2. [IMG-2022030912000303231314.jpg](#)
3. [IMG-20220309120238238149192.jpg](#)
4. [IMG-20220309120249249181942.jpg](#)
5. [IMG-20220309120311311147162.jpg](#)
6. [IMG-20220309120453453212165.jpg](#)
7. [IMG-2022030912050959208838.jpg](#)
8. [IMG-20220309120625625174410.jpg](#)
9. [IMG-20220309120633633148993.jpg](#)
10. [IMG-20220309120649649159058.jpg](#)
11. [IMG-20220309120934934283886.jpg](#)
12. [IMG-20220309120949949236705.jpg](#)
13. [IMG-20220309120958958262104.jpg](#)
14. [IMG-202203091211111111778464.jpg](#)
15. [IMG-202203091211241124515335.jpg](#)

Building: Seattle NDC (Network Distribution Center)/Maintenance Lube Area

Contains CBI: No

Observation #: JJ1-OB-007

Date: 03/09/2022

We went to the Maintenance Lube Area, across from the "Loose-in-the-mail" area and south of the Battery Shop. While there we saw two 5-gallon containers being used to accumulate used oil from the process of draining used oil filters. At the time of the inspection these two 5-gallon containers were not labeled with the words "Used Oil."

We also saw a 55-gallon container that was labeled as "Non-regulated alternative fuel mix." I asked Mr. Gibson what was in the container, and he said he wasn't sure. I asked him if he could ask someone in the area about it and after finding someone near the battery shop and asking them, it was determined that the container held used oil. At the time of the inspection, the container wasn't labeled with the words "Used Oil" and was not closed.

Photo(s)

1. [IMG-20220309122006206193927.jpg](#)
2. [IMG-202203091220152015135134.jpg](#)
3. [IMG-202203091224322432212910.jpg](#)
4. [IMG-202203091224432443218761.jpg](#)
5. [IMG-202203091224502450206022.jpg](#)
6. [IMG-202203091224592459106834.jpg](#)

Building: South Side of Building**Contains CBI:** No**Observation #:** JJ1-OB-004**Date:** 03/09/2022

While on the southside of the Seattle NDC Building, we saw a couple of 5-gallon paint containers on a pallet. Upon closer inspection, we saw that the paint containers were full of what appeared to be rainwater with a strange looking layer of scum on the top. According to the labeling on the paint containers, they last held some of the solvent-based traffic paint that we had previously seen. Next to the pallet, we saw a piece of cardboard. The piece of cardboard was covered in what appeared to be some of the solvent-based traffic paint that had been poured out of the paint containers. There were also some adjacent areas on the ground where it appeared that waste paint had been spilled.

Photo(s)

1. [IMG-202203091046114611233368.jpg](#)
2. [IMG-202203091046274627257572.jpg](#)
3. [IMG-202203091046344634275723.jpg](#)
4. [IMG-202203091046404640240359.jpg](#)
5. [IMG-202203091046464646289077.jpg](#)
6. [IMG-202203091046554655239929.jpg](#)

Records Review**SECTION III – AREAS OF CONCERN**

The presentation of areas of concern does not constitute a formal compliance determination or violation.

Building: Lubrication Shed	Area:	Sub-area:
JJ1-OB-005		
There was a clear plastic trash bag that was full of approximately 40 to 50 waste aerosols. At the time of the inspection, this trash bag was not labeled with the words, "Hazardous Waste" or "Dangerous Waste" and was not marked with a hazard indicator.	Regulation:	Sections:

Two 55-gallon containers labeled as containing "Oil - soaked rags" and possibly containing used oil as free liquid were not labeled with the words "Used Oil."	Regulation: WAC 173-303-515(6) and by reference 40 CFR Part 279.22(c)(1)	Sections:
Waste being accumulated in the Lubrication Shed was undesignated and waiting on Clean Harbors/Safety Kleen for designation. Additionally, wastes that had been designated as Hazardous or Dangerous Waste was not marked with hazard indicators.	Regulation:	Sections:
Building: OTR Shed	Area: Area West of the OTR Shed	Sub-area:
JJ1-OB-003		
Aerosols observed in the aircraft cargo container were inherently waste-like and undesignated.	Regulation: WAC 173-303-070(3)	Sections:
Multiple 5-gallon containers of waste solvent-based traffic paint observed in an aircraft cargo container and a 5-gallon container of an unknown liquid had not been designated.	Regulation: WAC 173-303-070(3)	Sections:
Adjacent to the aircraft cargo container, I saw a 5-gallon container of solvent-based yellow traffic paint that had been outside and allowed to freeze and thaw over the previous winter had not been designated.	Regulation: WAC 173-303-070(3)	Sections:
Building: OTR Shed	Area:	Sub-area:
JJ1-OB-002		

There were a total of 17 waste lead-acid batteries that were not labeled with the words "Universal Waste – Batteries", "Waste Batteries", or "Used Batteries."	Regulation: WAC 173-303-573(10)	Sections:
On the outer edge of the OTR Shed I saw a 5-gallon container of Solvent-based white traffic paint that was sitting outside over the previous winter and had been allowed to freeze and thaw one or more times and had not been designated.	Regulation: WAC 173-303-070(3)	Sections:
Building: Seattle NDC	Area: Maintenance Lube Area	Sub-area:
JJ1-OB-007		
There was a 55-gallon container that was labeled as "Non-regulated alternative fuel mix." It was determined that the container held used oil. At the time of the inspection, the container wasn't labeled with the words "Used Oil" and was not closed.	Regulation: WAC 173-303-515(6) and by reference 40 CFR Part 279.22(c)(1) WAC 173-303-515(6)(a)(i)	Sections:
Two 5-gallon containers used to accumulate used oil from the process of draining used oil filters were not labeled with the words "Used Oil".	Regulation: WAC 173-303-515(6) and by reference 40 CFR Part 279.22(c)(1)	Sections:
Building: Seattle NDC	Area: Room 133A	Sub-area:
JJ1-OB-001		
There were two small flat tubs that contained a mix of waste batteries and six loose lead-acid batteries that were not labeled as "Universal Waste – Batteries," "Waste Batteries," or "Used Batteries."	Regulation: WAC 173-303-573(10)	Sections:

There were eight cardboard boxes that held a mix of waste fluorescent and LED lamps. All eight boxes were not closed, and four of the eight boxes were not labeled with the words "Universal Waste – Lamps," "Waste Lamps," or "Used Lamps." One of the eight boxes of lamps was dated 2/2/2020 and had been accumulated for greater than one year.	Regulation: WAC 173-303-573(9)(c) WAC 173-303-573(10) WAC 173-303-573(11)	Sections:
Building: Seattle NDC	Area: Loose in the Mail	Sub-area:
JJ1-OB-006		
A significant number of Damaged items referred to as "Loose-in-the-mail" located in flammable storage lockers, two vent hood type storage areas, and on carts were either undesignated or if designated as either "Hazardous/Dangerous Waste" were not marked with hazard indicators.	Regulation:	Sections:
Building: South Side of Seattle NDC	Area:	Sub-area:
JJ1-OB-004		
Solvent-based traffic paint had been poured out onto a piece of cardboard to dry out. Adjacent to the cardboard, there were areas on the ground where it appeared as though waste paint had been spilled.	Regulation:	Sections:

SECTION IV – FOLLOW UP**Closing Conference**

At the conclusion of the inspection, I conducted a closing conference that was attended by those listed in the Attendees table, in Section I of this report. I thanked everyone for their time and cooperation during the inspection and began a review of the areas of concern (listed in Section III – Areas of Concern) that I observed during my inspection of the facility. I then explained the follow-up process that would take place once I finished the report. I explained they would receive a copy of the report as would a case officer. I told them the case officer would review the report to determine if any of my areas of concern documented violations.

During the closing conference, Mr. Gibson asked for a written list of the areas of concern and follow-up items that were reviewed during the closing conference. On March 15, 2022, I sent an email to Messrs. Schiller and Gibson which listed the areas of concern and follow-up items identified during the inspection.

Following the inspection, Mr. Gibson sent multiple emails to me on March 29 and 30, 2022. The information sent by Mr. Gibson included just a portion of the requested information and was not complete.

On April 1, 2022, I was contacted by Mr. Sydney Randell, Environmental Compliance Specialist with USPS. Mr. Randell's contact information is as follows:

Sydney C. Randell, CHMM, MBA
US Postal Service
HQ Corporate Sustainability Office
Environmental Compliance Specialist
8120 Hardeson Road, #226
Everett, WA 98203
425-438-2122 Cell: 425-512-2832

Mr. Randell said that he was following-up with me after the inspection and explained that he was going to be assisting Mr. Gibson with ensuring that the Seattle facility addresses the areas of concern and follow-up request. I forwarded the March 15, 2022, email that I had previously sent to Messrs. Schiller and Gibson, to Mr. Randell, as well as the response emails from Mr. Gibson, on April 5, 2022.

Mr. Randell called me, after hours, on April 5, 2022, and left a voicemail message. In that message he stated that he had looked over all the emails. He went on to say that Mr. Gibson had sent a lot of stuff to me including Safety Data sheets and to let him know what else was needed.

I responded to Mr. Randell's voicemail with an email on April 6, 2022. In that email I stated, "I had to reschedule a work trip to next week and due to other high priority commitments, I will not be able to get back with you, regarding your recent voicemail, until at least Monday, 4/18/22. I will call you then to discuss any remaining information that is still outstanding."

The email sent to Mr. Randell on April 6, 2022, was the last interaction with him prior to the issuance of this inspection report.

SECTION V – SAMPLING ACTIVITIES AND ANALYTICAL RESULTS - No sampling was conducted.

SECTION VI – LIST OF APPENDICES

Photo Log

[Title]

IMG-2022030911132813281155887.jpg

03/09/2022 11:13 AM (AKT)

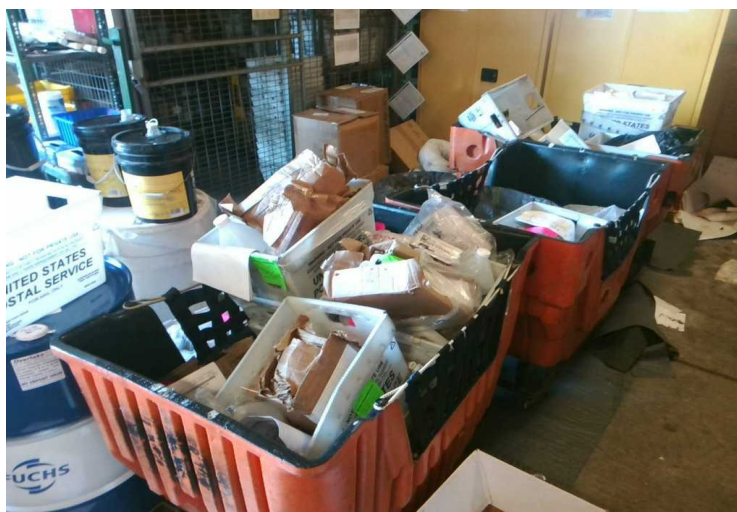
Jon Jones

Lubrication Shed

No CBI

No PII

View of an abundance of waste, including waste marked either as hazardous or non-hazardous. All waste with a green or pink label had been internally designated. All waste unlabeled was waiting on Clean Harbor/Safety Kleen for designation.



[Title]

IMG-2022030911133913391034403.jpg

03/09/2022 11:13 AM (AKT)

Jon Jones

Lubrication Shed

No CBI

No PII

Another view of an abundance of waste, including both hazardous and non-hazardous waste. Some was internally designated, and some is waiting on Clean Harbors/Safety Kleen for designation.



[Title]

IMG-202203091113481348850894.jpg

03/09/2022 11:13 AM (AKT)

Jon Jones

Lubrication Shed

No CBI

No PII

Another view of an abundance of waste, including waste marked as either hazardous or non-hazardous waste. Some was internally designated, and some is waiting on Clean Harbors/Safety Kleen for designation.



[Title]

IMG-2022030911135813581042537.jpg

03/09/2022 11:13 AM (AKT)

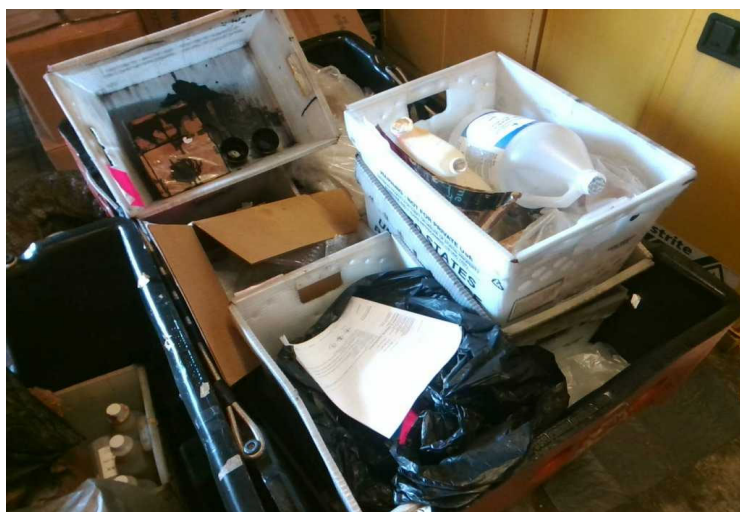
Jon Jones

Lubrication Shed

No CBI

No PII

Another view of an abundance of waste, including waste marked as either hazardous or non-hazardous waste. Some was internally designated, and some is waiting on Clean Harbors/Safety Kleen for designation.



[Title]

IMG-202203091114561456804231.jpg

03/09/2022 11:14 AM (AKT)

Jon Jones

Lubrication Shed

No CBI

No PII

Another view of an abundance of waste, including waste marked as either hazardous or non-hazardous waste. Some was internally designated, and some is waiting on Clean Harbors/Safety Kleen for designation.



[Title]

IMG-202203091115421542665058.jpg

03/09/2022 11:15 AM (AKT)

Jon Jones

Lubrication Shed

No CBI

No PII

Another view of an abundance of waste, including waste marked as either hazardous or non-hazardous waste. Some was internally designated, and some is waiting on Clean Harbors/Safety Kleen for designation.



[Title]

IMG-202203091117071771165145.jpg

03/09/2022 11:17 AM (AKT)

Jon Jones

Lubrication Shed

No CBI

No PII

Another view of an abundance of waste, including waste marked as either hazardous or non-hazardous waste. Some was internally designated, and some is waiting on Clean Harbors/Safety Kleen for designation.



[Title]

IMG-2022030911174517451111773.jpg

03/09/2022 11:17 AM (AKT)

Jon Jones

Lubrication Shed

No CBI

No PII

Another view of an abundance of waste, including waste marked as either hazardous or non-hazardous waste. Some was internally designated, and some is waiting on Clean Harbors/Safety Kleen for designation.



[Title]

IMG-202203091119351935993065.jpg

03/09/2022 11:19 AM (AKT)

Jon Jones

Lubrication Shed

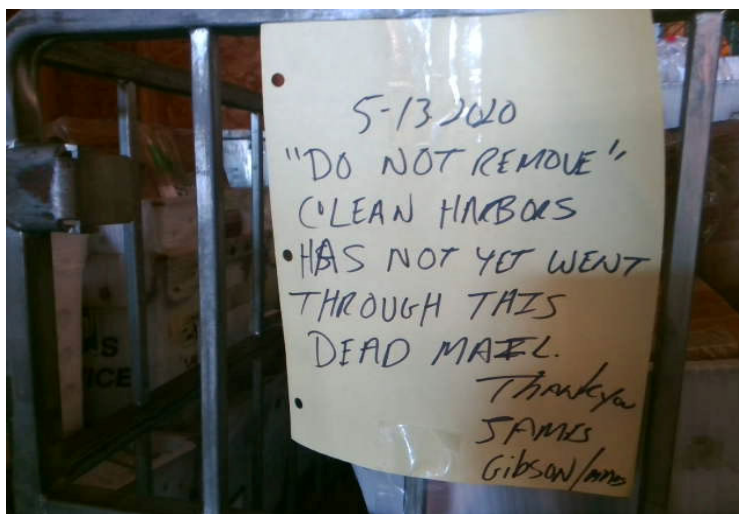
No CBI

No PII

Another view of an abundance of waste, including waste marked as either hazardous or non-hazardous waste. Some was internally designated, and some is waiting on Clean Harbors/Safety Kleen for designation.



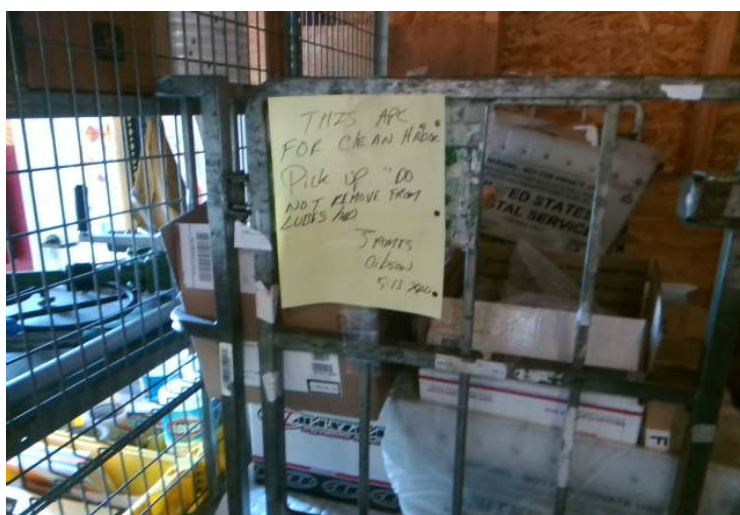
[Title]
IMG-2022030911195019501000045.jpg
03/09/2022 11:19 AM (AKT)
Jon Jones
Lubrication Shed
No CBI
No PII
Another view of an abundance of waste, including waste marked as either hazardous or non-hazardous waste. Some was internally designated, and some is waiting on Clean Harbors/Safety Kleen for designation.
[Title]
IMG-20220309112107217177696.jpg
03/09/2022 11:21 AM (AKT)
Jon Jones
Lubrication Shed
No CBI
No PII
View of signage on carts showing that the waste has been onsite and undesignated since 5/13/2020.
[Title]
IMG-202203091121132113204712.jpg
03/09/2022 11:21 AM (AKT)
Jon Jones
Lubrication Shed
No CBI
No PII
View of signage on carts showing that the waste has been onsite and undesignated since 5/13/2020.



[Title]
IMG-202203091121202120194332.jpg
03/09/2022 11:21 AM (AKT)
Jon Jones
Lubrication Shed
No CBI
No PII
View of signage on carts showing that the waste has been onsite and undesignated since 5/13/2020.



[Title]
IMG-202203091121262126243966.jpg
03/09/2022 11:21 AM (AKT)
Jon Jones
Lubrication Shed
No CBI
No PII
View of signage on carts showing that this waste has been onsite and undesignated since 5/13/2020.



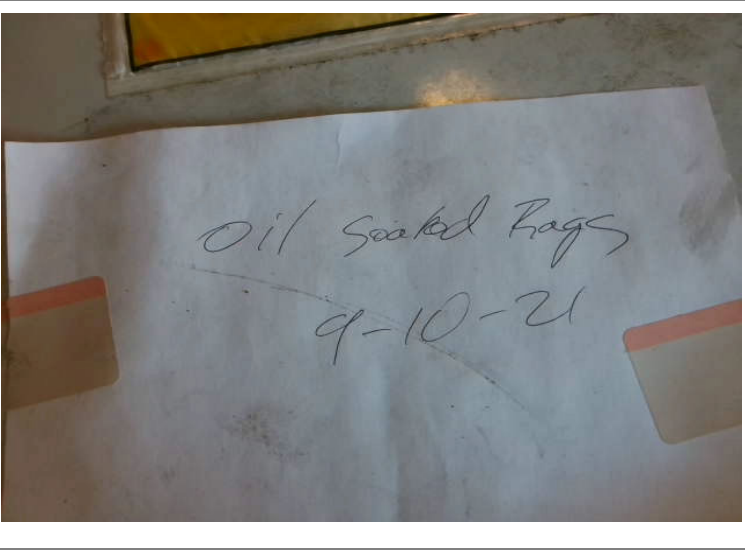
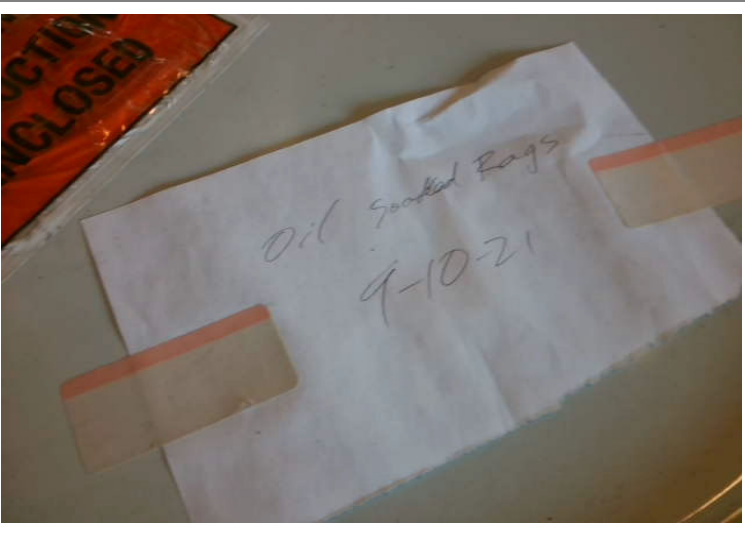
[Title]
IMG-202203091121432143168127.jpg
03/09/2022 11:21 AM (AKT)
Jon Jones
Lubrication Shed
No CBI
No PII
Another view of an abundance of waste, including waste marked as either hazardous or non-hazardous waste. Some was internally designated, and some is waiting on Clean Harbors/Safety Kleen for designation.



[Title]	
IMG-202203091121482148222050.jpg	
03/09/2022 11:21 AM (AKT)	
Jon Jones	
Lubrication Shed	
No CBI	
No PII	
Another view of an abundance of waste, including waste marked as either hazardous or non-hazardous waste. Some was internally designated, and some is waiting on Clean Harbors/Safety Kleen for designation.	
[Title]	
IMG-20220309112200220164048.jpg	
03/09/2022 11:22 AM (AKT)	
Jon Jones	
Lubrication Shed	
No CBI	
No PII	
View of the wastes on carts inside the caged area.	
[Title]	
IMG-20220309112208228198009.jpg	
03/09/2022 11:22 AM (AKT)	
Jon Jones	
Lubrication Shed	
No CBI	
No PII	
View of waste aerosols in a flat tub inside the caged area.	

Inspection Date(s):

03/09/2022 - 03/09/2022

[Title] IMG-202203091125382538195762.jpg 03/09/2022 11:25 AM (AKT) Jon Jones Lubrication Shed No CBI No PII View of 55-gallon containers holding various wastes. Two of these contained oil-soaked rags that were not labeled with the words "Used Oil."	
[Title] IMG-202203091125442544123159.jpg 03/09/2022 11:25 AM (AKT) Jon Jones Lubrication Shed No CBI No PII Close-up view of the labeling on one of the 55-gallon containers holding oil soaked rags seen in IMG-202203091125382538195762.jpg.	
[Title] IMG-202203091125532553123024.jpg 03/09/2022 11:25 AM (AKT) Jon Jones Lubrication Shed No CBI No PII Close-up view of the labeling on one of the 55-gallon containers holding oil soaked rags seen in IMG-202203091125382538195762.jpg.	

[Title]

IMG-202203091128532853270838.jpg

03/09/2022 11:28 AM (AKT)

Jon Jones

Lubrication Shed

No CBI

No PII

View of 12, 55-gallon containers and one, 25-gallon poly container, all of which contained wastes and most of which still required a waste designation.



[Title]

IMG-20220309112904294246570.jpg

03/09/2022 11:29 AM (AKT)

Jon Jones

Lubrication Shed

No CBI

No PII

Another view of 12, 55-gallon containers and one, 25-gallon poly container, most of which still required a waste designation.



[Title]

IMG-202203091129182918260276.jpg

03/09/2022 11:29 AM (AKT)

Jon Jones

Lubrication Shed

No CBI

No PII

Another view of 12, 55-gallon containers and one, 25-gallon poly container, most of which still required a waste designation.



[Title]

IMG-202203091132303230201617.jpg

03/09/2022 11:32 AM (AKT)

Jon Jones

Lubrication Shed

No CBI

No PII

View of a bag of waste aerosols. I was told by Mr. Gibson that all waste aerosols generated on-site are managed as hazardous waste. The bag is not labeled as either Hazardous or Dangerous Waste or marked with a hazard indicator.



[Title]

IMG-202203091132373237212349.jpg

03/09/2022 11:32 AM (AKT)

Jon Jones

Lubrication Shed

No CBI

No PII

Close-up view of a bag of waste aerosols. I was told by Mr. Gibson that all waste aerosols generated on-site are managed as hazardous waste. The bag is not labeled as either Hazardous or Dangerous Waste or marked with a hazard indicator.



[Title]

IMG-202203091132463246211562.jpg

03/09/2022 11:32 AM (AKT)

Jon Jones

Lubrication Shed

No CBI

No PII

Another close-up view of a bag of waste aerosols. I was told by Mr. Gibson that all waste aerosols generated on-site are managed as hazardous waste. The bag is not labeled as either Hazardous or Dangerous Waste or marked with a hazard indicator.



[Title]

IMG-20220309095708578210104.jpg

03/09/2022 09:57 AM (AKT)

Jon Jones

OTR Shed

No CBI

No PII

View of a 5-gallon container of solvent-based white traffic paint that has been sitting outside and allowed to freeze and thaw over the winter. Leaving paint out is not managing it as a valuable product, but as a waste. Therefore, this waste requires a waste designation.



[Title]

IMG-2022030909574157411194180.jpg

03/09/2022 09:57 AM (AKT)

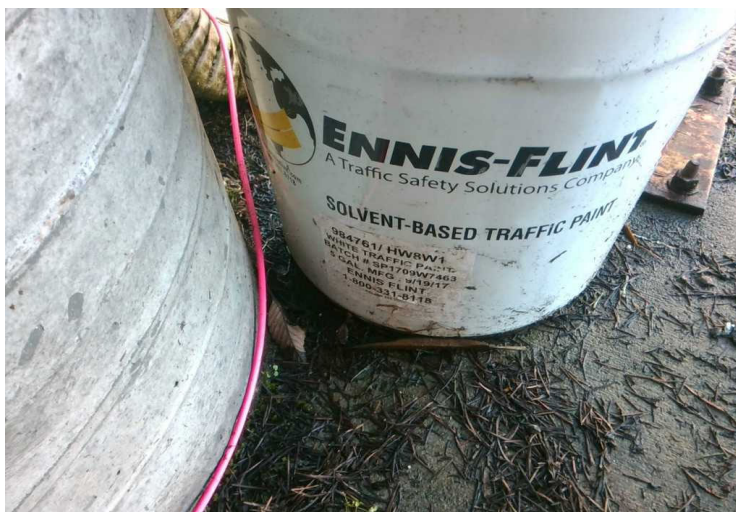
Jon Jones

OTR Shed

No CBI

No PII

Close-up view of a 5-gallon container of solvent-based white traffic paint that has been sitting outside and allowed to freeze and thaw over the winter. Leaving paint out is not managing it as a valuable product, but as a waste. Therefore, this waste requires a waste designation.



[Title]

IMG-202203090958045841071168.jpg

03/09/2022 09:58 AM (AKT)

Jon Jones

OTR Shed

No CBI

No PII

Another view of a 5-gallon container of solvent-based white traffic paint that has been sitting outside and allowed to freeze and thaw over the winter. Leaving paint out is not managing it as a valuable product, but as a waste. Therefore, this waste requires a waste designation.



[Title]

IMG-2022030910040242247020.jpg

03/09/2022 10:04 AM (AKT)

Jon Jones

OTR Shed

No CBI

No PII

View of 17 waste lead-acid batteries. Mr. Gibson told us these batteries would be managed by the site as Universal Waste. The batteries are not labeled as "Universal Waste – Batteries," "Waste Batteries," or "Used Batteries."



[Title]

IMG-2022030910040848270084.jpg

03/09/2022 10:04 AM (AKT)

Jon Jones

OTR Shed

No CBI

No PII

Another view of 17 waste lead-acid batteries. Mr. Gibson told us these batteries would be managed by the site as Universal Waste. The batteries are not labeled as "Universal Waste – Batteries," "Waste Batteries," or "Used Batteries."



[Title]

IMG-20220309100418418178931.jpg

03/09/2022 10:04 AM (AKT)

Jon Jones

OTR Shed

No CBI

No PII

Close-up view of waste lead-acid batteries. Mr. Gibson told us these batteries would be managed by the site as Universal Waste. The batteries are not labeled as "Universal Waste – Batteries," "Waste Batteries," or "Used Batteries."



[Title]

IMG-20220309100425425273172.jpg

03/09/2022 10:04 AM (AKT)

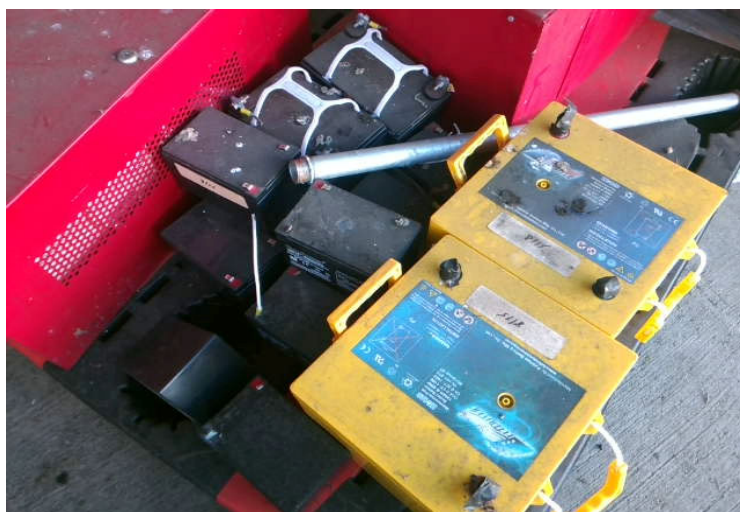
Jon Jones

OTR Shed

No CBI

No PII

Close-up view of waste lead-acid batteries. Mr. Gibson told us these batteries would be managed by the site as Universal Waste. The batteries are not labeled as "Universal Waste – Batteries," "Waste Batteries," or "Used Batteries."



[Title]

IMG-202203091010351035226715.jpg

03/09/2022 10:10 AM (AKT)

Jon Jones

OTR Shed/Area West of the OTR Shed

No CBI

No PII

View of a 5-gallon container of solvent-based yellow traffic paint that has been sitting outside and allowed to freeze and thaw over the winter. Leaving paint out is not managing it as a valuable product, but as a waste. Therefore, this waste requires a waste designation.



[Title]

IMG-202203091010451045280255.jpg

03/09/2022 10:10 AM (AKT)

Jon Jones

OTR Shed/Area West of the OTR Shed

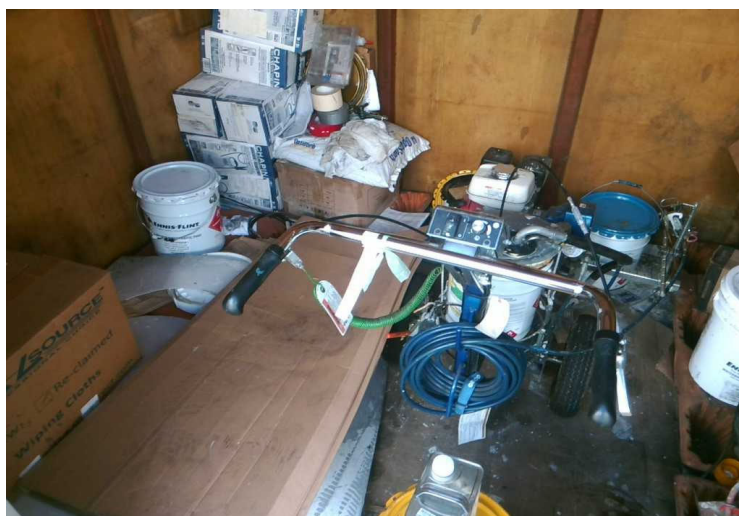
No CBI

No PII

Close-up view of a 5-gallon container of solvent-based yellow traffic paint that has been sitting outside and allowed to freeze and thaw over the winter. Leaving paint out is not managing it as a valuable product, but as a waste. Therefore, this waste requires a waste designation.



[Title]
IMG-202203091010511051302794.jpg
03/09/2022 10:10 AM (AKT)
Jon Jones
OTR Shed/Area West of the OTR Shed
No CBI
No PII
Another close-up view of a 5-gallon container of solvent-based yellow traffic paint that has been sitting outside and allowed to freeze and thaw over the winter. Leaving paint out is not managing it as a valuable product, but as a waste. Therefore, this waste requires a waste designation.
[Title]
IMG-2022030910245524551040579.jpg
03/09/2022 10:24 AM (AKT)
Jon Jones
OTR Shed/Area West of the OTR Shed
No CBI
No PII
View of 5-gallon containers of solvent-based traffic paint that has been left inside of an unheated storage container and allowed to freeze and thaw over the winter. Some of the containers had not been closed and may have been allowed to dry out.
[Title]
IMG-202203091025022521140670.jpg
03/09/2022 10:25 AM (AKT)
Jon Jones
OTR Shed/Area West of the OTR Shed
No CBI
No PII
Another view of 5-gallon containers of solvent-based traffic paint that has been left inside of an unheated storage container and allowed to freeze and thaw over the winter. Some of the containers had not been closed and may have been allowed to dry out.



[Title]

IMG-2022030910251225121195899.jpg

03/09/2022 10:25 AM (AKT)

Jon Jones

OTR Shed/Area West of the OTR Shed

No CBI

No PII

Another view of 5-gallon containers of solvent-based traffic paint that has been left inside of an unheated storage container and allowed to freeze and thaw over the winter. Some of the containers had not been closed and may have been allowed to dry out.



[Title]

IMG-202203091031213121976396.jpg

03/09/2022 10:31 AM (AKT)

Jon Jones

OTR Shed/Area West of the OTR Shed

No CBI

No PII

View of container of flooring adhesive left inside an unheated storage container and allowed to freeze and thaw over the winter. Leaving chemical products out is not managing them as a valuable product, but as wastes.



[Title]

IMG-202203091036163616226746.jpg

03/09/2022 10:36 AM (AKT)

Jon Jones

OTR Shed/Area West of the OTR Shed

No CBI

No PII

View of aerosol cans inside of a cardboard box left inside an unheated storage container. Leaving cans of paint out is not managing them as a valuable products, but as a waste. Therefore, these aerosol cans waste requires a waste designation, especially since Mr. Gibson told me the site manages waste aerosol cans as hazardous waste.



[Title]

IMG-202203091036283628231323.jpg

03/09/2022 10:36 AM (AKT)

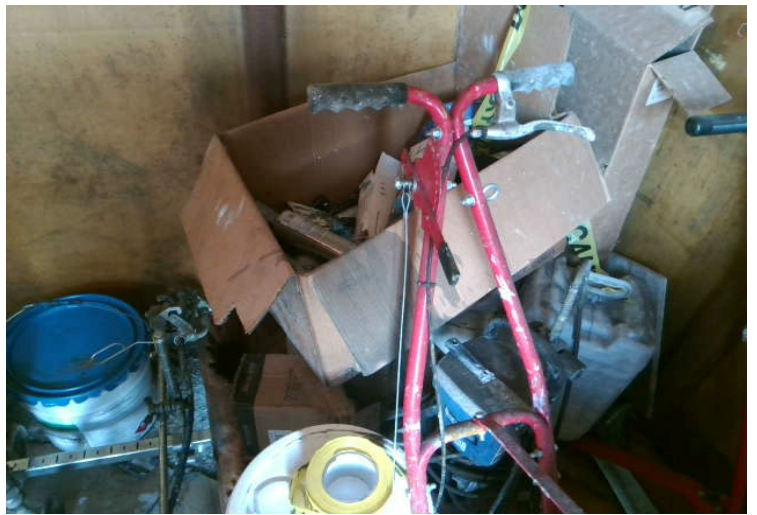
Jon Jones

OTR Shed/Area west of the OTR Shed

No CBI

No PII

View of the cardboard box containing the aerosols seen in IMG-202203091036163616226746.jpg.



[Title]

IMG-202203090913511351929676.jpg

03/09/2022 09:13 AM (AKT)

Jon Jones

Seattle NDC Room 133A

No CBI

No PII

View of eight cardboard boxes, containing waste fluorescent/LED lamps. Mr. Gibson told us the site manages all lamps as universal waste. Each of the boxes were not closed and four of the eight boxes are also seen here not labeled as either "Universal Waste – Lamps", "Waste – Lamps", or "Used Lamps."



[Title]

IMG-202203090914111411852883.jpg

03/09/2022 09:14 AM (AKT)

Jon Jones

Seattle NDC Room 133A

No CBI

No PII

Close-up view of eight cardboard boxes, containing waste fluorescent/LED lamps. Mr. Gibson told us the site manages all lamps as universal waste. Each of the boxes were not closed and four of the eight boxes are also seen here not labeled as either "Universal Waste – Lamps", "Waste – Lamps", or "Used Lamps."



[Title]

IMG-202203090914321432707731.jpg

03/09/2022 09:14 AM (AKT)

Jon Jones

Seattle NDC Room 133A

No CBI

No PII

View of the label on one box of universal waste lamps that is seen here, dated 2/2/2020, indicating that the lamps have been in accumulation for greater than one year.



[Title]

IMG-202203090914531453169634.jpg

03/09/2022 09:14 AM (AKT)

Jon Jones

Seattle NDC Room 133A

No CBI

No PII

Close-up view of the label on one box of universal waste lamps that is seen here, dated 2/2/2020, indicating that the lamps have been in accumulation for greater than one year.



[Title]

IMG-202203090914591459160096.jpg

03/09/2022 09:14 AM (AKT)

Jon Jones

Seattle NDC Room 133A

No CBI

No PII

Another view of the box of universal waste lamps that is seen here in the center of the photo, dated 2/2/2020, indicating that the lamps have been in accumulation for greater than one year.



[Title]

IMG-202203090915291529107783.jpg

03/09/2022 09:15 AM (AKT)

Jon Jones

Seattle NDC Room 133A

No CBI

No PII

View of signage above the waste lamp accumulation area that includes instructions on the proper management of universal waste lamps.



[Title]

IMG-202203090915351535185647.jpg

03/09/2022 09:15 AM (AKT)

Jon Jones

Seattle NDC Room 133A

No CBI

No PII

Additional close-up view of some of the cardboard boxes, containing waste fluorescent/LED lamps managed by the site as universal waste, that were not closed or labeled as either "Universal Waste – Lamps", "Waste – Lamps", or "Used Lamps."



[Title]

IMG-202203090915481548200046.jpg

03/09/2022 09:15 AM (AKT)

Jon Jones

Seattle NDC Room 133A

No CBI

No PII

Additional close-up view of some of the cardboard boxes, containing waste fluorescent/LED lamps managed by the site as universal waste, that were not closed or labeled as either "Universal Waste – Lamps", "Waste – Lamps", or "Used Lamps."



[Title]
IMG-20220309091605165140849.jpg
03/09/2022 09:16 AM (AKT)
Jon Jones
Seattle NDC Room 133A
No CBI
No PII
View of waste lamps managed by the site as universal waste inside one of the cardboard boxes that is not closed.
[Title]
IMG-202203090916391639147324.jpg
03/09/2022 09:16 AM (AKT)
Jon Jones
Seattle NDC Room 133A
No CBI
No PII
Another view of the cardboard boxes that held waste lamps that the site manages as universal waste showing that two of the boxes, seen here in the center of the photo, are not closed, or labeled as either "Universal Waste – Lamps", "Waste – Lamps", or "Used Lamps."
[Title]
IMG-202203090922402240172032.jpg
03/09/2022 09:22 AM (AKT)
Jon Jones
Seattle NDC Room 133A
No CBI
No PII
View of a 5-gallon poly container being used to accumulate broken waste bulbs. The container had a label indicating the site waste managing these broken bulbs as universal waste.



[Title] IMG-20220309092307237128382.jpg 03/09/2022 09:23 AM (AKT) Jon Jones Seattle NDC Room 133A No CBI No PII Close-up view of the label on the 5-gallon poly container being used to accumulate broken waste bulbs, showing that it was being managed as universal waste.	
[Title] IMG-202203090923192319179872.jpg 03/09/2022 09:23 AM (AKT) Jon Jones Seattle NDC Room 133A No CBI No PII Another view of the 5-gallon poly container being used to accumulate broken waste bulbs the site was managing as universal waste.	
[Title] IMG-202203090939143914178511.jpg 03/09/2022 09:39 AM (AKT) Jon Jones Seattle NDC Room 133A No CBI No PII View of two flat tubs that contain a mix of batteries and six loose lead-acid batteries. Mr. Gibson told me that the site manages all batteries generated by the site as universal waste. None of the tubs, batteries, or the box were labeled as either "Universal Waste – Batteries", "Waste Batteries", or "Used Batteries."	

[Title]	
IMG-202203090939233923173254.jpg	
03/09/2022 09:39 AM (AKT)	
Jon Jones	
Seattle NDC Room 133A	
No CBI	
No PII	
Another view of the two flat tubs that contain a mix of batteries and six loose lead-acid batteries. Mr. Gibson told me that the site manages all batteries generated by the site as universal waste. None of the tubs or the batteries are labeled as "Universal Waste – Batteries", "Waste Batteries", or "Used Batteries."	
[Title]	
IMG-202203090939363936194058.jpg	
03/09/2022 09:39 AM (AKT)	
Jon Jones	
Seattle NDC Room 133A	
No CBI	
No PII	
Another view of the two flat tubs that contain a mix of batteries and six loose lead-acid batteries. Mr. Gibson told me that the site manages all batteries generated by the site as universal waste. None of the tubs or the batteries are labeled as either "Universal Waste – Batteries", "Waste Batteries", or "Used Batteries."	

[Title]
IMG-202203090939473947172316.jpg
03/09/2022 09:39 AM (AKT)
Jon Jones
Seattle NDC Room 133A
No CBI
No PII
Close-up view of the two flat tubs that contain a mix of batteries and six loose lead-acid batteries. Mr. Gibson told me that the site manages all batteries generated by the site as universal waste. None of the tubs or the batteries are labeled as either "Universal Waste – Batteries", "Waste Batteries", or "Used Batteries."
[Title]
IMG-202203090939573957186637.jpg
03/09/2022 09:39 AM (AKT)
Jon Jones
Seattle NDC Room 133A
No CBI
No PII
Close-up view of the two flat tubs that contain a mix of batteries. Mr. Gibson told me that the site manages all batteries generated by the site as universal waste. None of the tubs or the batteries are labeled as either "Universal Waste – Batteries", "Waste Batteries", or "Used Batteries."
[Title]
IMG-202203090944354435177924.jpg
03/09/2022 09:44 AM (AKT)
Jon Jones
Seattle NDC Room 133A
No CBI
No PII
View of another container that held four non-PCB ballasts. The container was labeled as universal waste and dated 4/17/2020.



[Title]

IMG-202203090944444444136942.jpg

03/09/2022 09:44 AM (AKT)

Jon Jones

Seattle NDC Room 133A

No CBI

No PII

Close-up view of the container label on the container of waste non-PCB ballasts. The container was labeled as universal waste and dated 4/17/2020.



[Title]

IMG-202203090944514451100827.jpg

03/09/2022 09:44 AM (AKT)

Jon Jones

Seattle NDC Room 133A

No CBI

No PII

View of the Non-PCB ballasts inside the container. The container was labeled as universal waste and dated 4/17/2020.



[Title]

IMG-202203091159565956233388.jpg

03/09/2022 11:59 AM (AKT)

Jon Jones

Seattle NDC Loose in the Mail

No CBI

No PII

View of the carts that contain damaged items in process, also referred to as "Loose-in-the-Mail."



[Title]

IMG-2022030912000303231314.jpg

03/09/2022 12:00 PM (AKT)

Jon Jones

Seattle NDC Loose in the Mail

No CBI

No PII

Another view of the carts that contain damaged items in process, also referred to as "Loose-in-the-Mail."



[Title]

IMG-20220309120238238149192.jpg

03/09/2022 12:02 PM (AKT)

Jon Jones

Seattle NDC Loose in the Mail

No CBI

No PII

View of the flammable storage cabinet marked as "Items for Disposal Only."



[Title]

IMG-20220309120249249181942.jpg

03/09/2022 12:02 PM (AKT)

Jon Jones

Seattle NDC Loose in the Mail

No CBI

No PII

View of the contents inside the flammable storage cabinet marked as "Items for disposal only."



[Title]
IMG-20220309120311311147162.jpg
03/09/2022 12:03 PM (AKT)
Jon Jones
Seattle NDC Loose in the Mail
No CBI
No PII
View of the contents inside an adjacent flammable storage cabinet. Note: Pink labels were observed with the word "Hazardous" printed on them
[Title]
IMG-20220309120453453212165.jpg
03/09/2022 12:04 PM (AKT)
Jon Jones
Seattle NDC Loose in the Mail
No CBI
No PII
View of two small, vented storage areas where "Loose-in-the-Mail" waste were being accumulated. Note: Pink labels were observed with the word "Hazardous" printed on them.
[Title]
IMG-2022030912050959208838.jpg
03/09/2022 12:05 PM (AKT)
Jon Jones
Seattle NDC Loose in the Mail
No CBI
No PII
View of "Loose-in-the-Mail" wastes inside one of the small, vented accumulation areas. Note: Pink labels were observed with the word "Hazardous" printed on them.



[Title]	
IMG-20220309120625625174410.jpg	
03/09/2022 12:06 PM (AKT)	
Jon Jones	
Seattle NDC Loose in the Mail	
No CBI	
No PII	
Close-up view of one of the Hazardous labels on a cardboard box that was inside one of the small, vented accumulation areas.	
[Title]	
IMG-20220309120633633148993.jpg	
03/09/2022 12:06 PM (AKT)	
Jon Jones	
Seattle NDC Loose in the Mail	
No CBI	
No PII	
Another close-up view of one of the Hazardous labels on a cardboard box that was inside one of the small, vented accumulation areas.	
[Title]	
IMG-20220309120649649159058.jpg	
03/09/2022 12:06 PM (AKT)	
Jon Jones	
Seattle NDC Loose in the Mail	
No CBI	
No PII	
Another close-up view of one of the Hazardous labels on a cardboard box that was inside one of the small, vented accumulation areas.	

[Title]

IMG-20220309120934934283886.jpg

03/09/2022 12:09 PM (AKT)

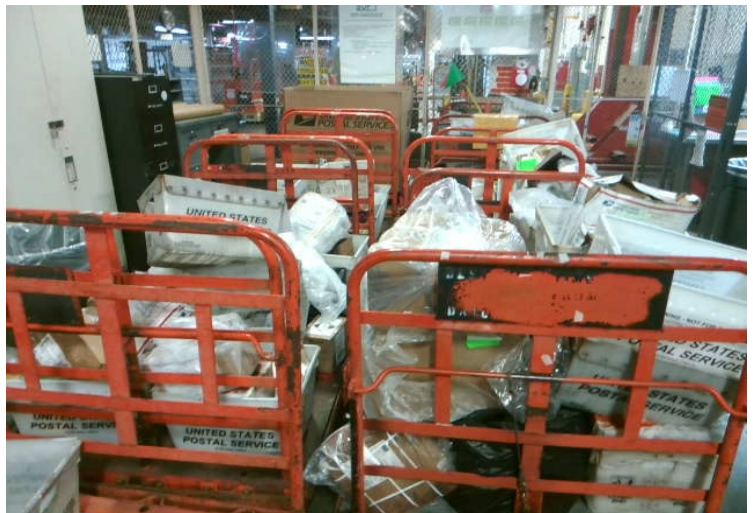
Jon Jones

Seattle NDC Loose in the Mail

No CBI

No PII

View of additional carts containing "Loose-in-the-Mail" waste. Note: green labels were observed with the word "Non-hazardous" on them.



[Title]

IMG-20220309120949949236705.jpg

03/09/2022 12:09 PM (AKT)

Jon Jones

Seattle NDC Loose in the Mail

No CBI

No PII

Another view of the same carts containing "Loose-in-the-Mail" waste. Note: green labels were observed with the word "Non-hazardous" on them.



[Title]

IMG-20220309120958958262104.jpg

03/09/2022 12:09 PM (AKT)

Jon Jones

Seattle NDC Loose in the Mail

No CBI

No PII

Another view of the same carts containing "Loose-in-the-Mail" waste.



[Title]

IMG-202203091211111111778464.jpg

03/09/2022 12:11 PM (AKT)

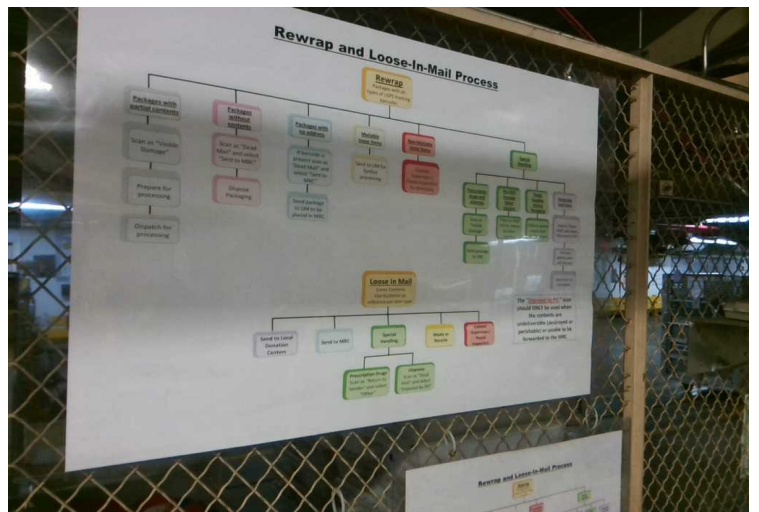
Jon Jones

Seattle NDC Loose in the Mail

No CBI

No PII

View of instructional signage in the area regarding "Rewrap and Loose-in-Mail Process."



[Title]

IMG-202203091211241124515335.jpg

03/09/2022 12:11 PM (AKT)

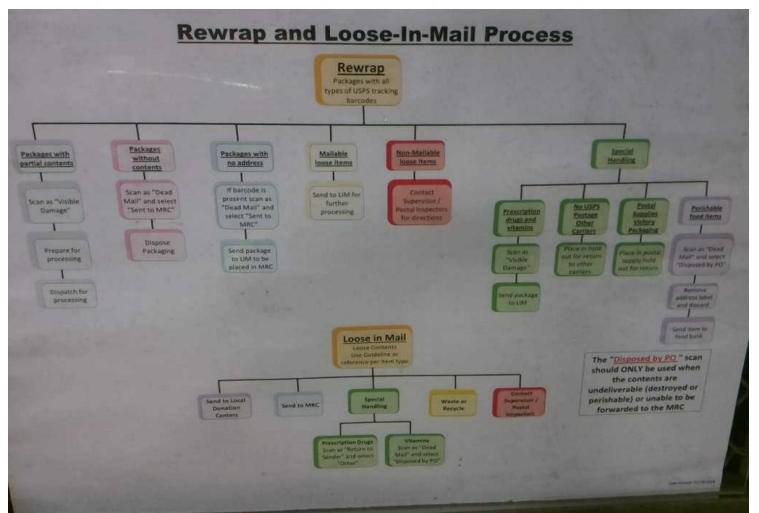
Jon Jones

Seattle NDC Loose in the Mail

No CBI

No PII

Another view of instructional signage in the area regarding "Rewrap and Loose-in-Mail Process."



[Title]

IMG-20220309122006206193927.jpg

03/09/2022 12:20 PM (AKT)

Jon Jones

Seattle NDC Maintenance Lube Area

No CBI

No PII

View of two, 5-gallon containers, being used to accumulate used oil from the process of draining used oil filters, that are not labeled with the words "Used Oil."



[Title] IMG-202203091220152015135134.jpg 03/09/2022 12:20 PM (AKT) Jon Jones Seattle NDC Maintenance Lube Area No CBI No PII Close-up view of two, 5-gallon containers, being used to accumulate used oil from the process of draining used oil filters, that are not labeled with the words "Used Oil."	
[Title] IMG-202203091224322432212910.jpg 03/09/2022 12:24 PM (AKT) Jon Jones Seattle NDC Maintenance Lube Area No CBI No PII View of 55-gallon container, labeled as "Non-regulated alternative fuel mix", containing material managed as used oil, seen here not labeled with the words "Used Oil" and not closed.	
[Title] IMG-202203091224432443218761.jpg 03/09/2022 12:24 PM (AKT) Jon Jones Seattle NDC Maintenance Lube Area No CBI No PII Another view of the same 55-gallon container, seen here not labeled with the words "Used Oil" and not closed.	

[Title]	
IMG-202203091224502450206022.jpg	
03/09/2022 12:24 PM (AKT)	
Jon Jones	
Seattle NDC Maintenance Lube Area	
No CBI	
No PII	
A view of the funnel on top of the same 55-gallon used oil container labeled as "Non-regulated alternative fuel mix" instead of labeled with the words "Used Oil."	
[Title]	
IMG-202203091224592459106834.jpg	
03/09/2022 12:24 PM (AKT)	
Jon Jones	
Seattle NDC Maintenance Lube Area	
No CBI	
No PII	
Close-up view of the same used oil container with an open bung, showing that it's not closed.	
[Title]	
IMG-202203091046114611233368.jpg	
03/09/2022 10:46 AM (AKT)	
Jon Jones	
South Side of Seattle NDC Building	
No CBI	
No PII	
View of the pallet and piece of cardboard where waste paint had been disposed.	

[Title]

IMG-202203091046274627257572.jpg

03/09/2022 10:46 AM (AKT)

Jon Jones

South Side of Seattle NDC Building

No CBI

No PII

Closer view of the pallet which had two, 5-gallon containers labeled as containing solvent-based traffic paint adjacent to a piece of cardboard. Someone poured waste paint onto the cardboard to dry out the paint. This photo also shows areas adjacent to the pallet and cardboard where this paint had spilled directly onto the ground.



[Title]

IMG-202203091046344634275723.jpg

03/09/2022 10:46 AM (AKT)

Jon Jones

South Side of Seattle NDC Building

No CBI

No PII

Another view of the solvent-based traffic paint that had been poured out onto a piece of cardboard.



[Title]

IMG-202203091046404640240359.jpg

03/09/2022 10:46 AM (AKT)

Jon Jones

South Side of Seattle NDC Building

No CBI

No PII

Close-up view of the 5-gallon containers, seen here on the pallet, that contain what appeared to be rainwater and paint scum floating on top of the water.



[Title]	
IMG-202203091046464646289077.jpg	
03/09/2022 10:46 AM (AKT)	
Jon Jones	
South Side of Seattle NDC Building	
No CBI	
No PII	
Another close-up view of the 5-gallon containers, seen here on the pallet, that contain what appeared to be rainwater and paint scum floating on top of the water.	
[Title]	
IMG-202203091046554655239929.jpg	
03/09/2022 10:46 AM (AKT)	
Jon Jones	
South Side of Seattle NDC Building	
No CBI	
No PII	
Another close-up view of the 5-gallon containers, seen here on the pallet, that contain what appeared to be rainwater and paint scum floating on top of the water.	

Document Log

Document Type	Document Name	Contains CBI	Contains PII	Uploaded By	Date Received
Universal Waste Disposal Receipts	Universal Waste Manifests.pdf	No	No	Jon Jones	04/07/2022
Other - Safety Data Sheet	alpine black paint.pdf	No	No	Jon Jones	04/07/2022
Other - Safety Data Sheet	alpine blue paint.pdf	No	No	Jon Jones	04/07/2022
Other - Safety Data Sheet	alpine red paint.pdf	No	No	Jon Jones	04/07/2022
Other - Safety Data	alpine white paint.pdf	No	No	Jon Jones	04/07/2022

Inspection Date(s):

03/09/2022 - 03/09/2022

Sheet					
Other - Safety Data Sheet	alpine yellow paint.pdf	No	No	Jon Jones	04/07/2022
Manifests	Lube Shed_Manifests_1.pdf	No	No	Jon Jones	04/07/2022
Manifests	Lube Shed_Manifests_2.pdf	No	No	Jon Jones	04/07/2022
Manifests	Lube Shed_Manifests_3.pdf	No	No	Jon Jones	04/07/2022
Manifests	Lube Shed_Manifests_4.pdf	No	No	Jon Jones	04/07/2022
Manifests	Lube Shed_Manifests_5.pdf	No	No	Jon Jones	04/07/2022
Other - Lube Shed Inventory (Partial)	LUBESH~1.PDF	No	No	Jon Jones	04/07/2022