U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 7
CLEAN WATER ACT
COMPLIANCE INSPECTION REPORT

for

Name of Facility: United States Postal Service Des Moines Network Distribution Center
Facility Address: 4000 109th Street Des Moines, Iowa 50395-9989
Mailing Address: 4000 109th Street Des Moines, Iowa 50395-9989

Report Prepared on: November 18, 2024 *Date* By: Kelsey Guy Digitally signed by Kelsey Guy Date: 2024.11.18 18:59:20 -05'00' *Signature*, ERG

Report Final as of: 11/19/24 *Date* By: NICOLE MORAN Digitally signed by NICOLE MORAN Date: 2024.11.19 17:02:25 -06'00' *Signature*, EPA

General Information

Type of Inspection:	Industrial Storm Water
Owner:	United States Postal Service
Operator:	United States Postal Service
GPS Coordinates:	41.635158°, -93.770505°
Permittee:	United States Postal Service (USPS) Des Moines Network Distribution Center (NDC)
Permit/Authorization No:	31687—31664
Permit Effective Date:	October 1, 2022
Permit Expiration Date:	October 1, 2027
Receiving Water and/or MS4:	City storm sewer system east to unnamed tributary to North Walnut Creek; and city storm sewer system west to unnamed tributaries to Walnut Creek
Standard Industrial Classification (SIC) Code:	4311 – United States Postal Service

On-Site Inspection Overview

On September 25, 2024, U.S. Environmental Protection Agency (EPA) contractors from Eastern Research Group, Inc. (hereinafter, EPA Inspection Team) conducted an industrial storm water inspection of the above referenced facility (hereinafter, facility or permittee).

Inspection Date: September 25, 2024 **Entry Time:** 8:00 AM (CT) **Exit Time:** 10:46 AM (CT)

The following personnel were involved in the facility inspection.

Name	Title/Affiliation	Telephone	Email	Signature of Inspector
Inspectors:				
Taylor Fontaine	Inspector – Eastern Research Group, Inc.	(703) 956-1977	taylor.fontaine@erg.com	
Kelsey Guy	Inspector – Eastern Research Group, Inc.	(703) 633-1103	kelsey.guy@erg.com	
Facility Representative(s):				
Natasha Wilson	Plant Manager	(515) 314-8248	natasha.a.wilson@usps.gov	
Jeff Way	Safety Specialist	(515) 251-2234	jeff.l.way@usps.gov	
Bonnie Erwin	Safety Specialist	(515) 251-2236	bonnie.b.erwin@usps.gov	
Antonio Williams	Maintenance Manager	(515) 988-4546	antonio.c.williams@usps.gov	
Wade Caramazza	Maintenance Support Manager	(515) 278-7658	wade.r.caramazza@usps.gov	
Name	**Title/Affiliation**	**Telephone**	**Email**	**Signature of Inspector**
EPA Responsible Official:				
Nicole Moran	Acting Branch Chief – Water Branch of ECAD	(913) 551-7641	moran.nicole@epa.gov	

Credential Presentation

Taylor Fontaine with Eastern Research Group, Inc. presented credentials to all USPS facility representatives listed in the table above upon arrival at the facility on September 25, 2024, at approximately 8:07 AM. Taylor Fontaine explained that the purpose of the inspection was to observe compliance with the State of Iowa Department of Natural Resources (DNR) National Pollutant Discharge Elimination System (NPDES) Permit No. 1 for Storm Water Discharges Associated with Industrial Activities (hereinafter, the permit). A copy of the permit is provided in Appendix A.

Weather and Precipitation

The weather on September 25, 2024, during the inspection, was clear skies with temperatures averaging approximately 70 degrees Fahrenheit. National Oceanic and Atmospheric Administration (NOAA) National Weather Service precipitation data prior to the inspection are provided in the table below.

Precipitation Data Prior to Inspection of the United States Postal Service Des Moines (NDC)

Station Name	Date	Precipitation Amount (inches)[a]
CLIVE 4.7 WNW, IA US US1IADL0032	September 21, 2024	0.00
CLIVE 4.7 WNW, IA US US1IADL0032	September 22, 2024	0.60
CLIVE 4.7 WNW, IA US US1IADL0032	September 23, 2024	0.00
CLIVE 4.7 WNW, IA US US1IADL0032	September 24, 2024	0.00
CLIVE 4.7 WNW, IA US US1IADL0032	September 25, 2024	0.00

[a] Source: NOAA National Climatic Data Center (http://www.ncdc.noaa.gov/).

Documentation

During the inspection, the EPA Inspection Team obtained and reviewed documentation and other supporting evidence regarding compliance with the permit and implementation of the facility's Storm Water Pollution Prevention Plan (SWPPP). During the inspection, the EPA Inspection Team requested to review the onsite SWPPP and the previous year's training records. The facility provided an electronic copy of the SWPPP (refer to Appendix C, Exhibit 1) and training records (refer to Appendix C, Exhibit 2) to the EPA Inspection Team post-inspection on October 8, 2024.

Photographs taken by Kelsey Guy, Eastern Research Group, Inc., during the inspection, are provided in Appendix B, and supporting documentation (i.e., exhibits) are provided in Appendix C. An aerial diagram of the facility is provided in Appendix D.

Description of the Facility and Industrial Activity

The United States Postal Service Des Moines NDC is a 400,000-square foot letter and package depot with approximately 600 employees. The primary services of the facility include letter and package sorting for distribution. According to facility representatives, there are three such distribution centers in the region and twenty-one total across the country.

The facility maintains heavy machinery onsite (e.g., tugs/spotter vehicles, skid steers, 18-wheelers, forklifts, street sweepers, and mowers). The facility conducts general maintenance on their heavy machinery, but facility representatives stated all maintenance is done indoors. The facility has two double-walled aboveground storage tanks (ASTs), one 311-gallon diesel tank and one 2,000-gallon

diesel tank. The facility stores new 5-gallon oil buckets and 55-gallon barrels of waste oil/lubricants on spill pallets inside the facility.

The eastern portion of the facility's lot serves as personnel parking. The southern portion houses several storage garages/sheds and vehicle parking, as well as parking and storage for facility compactors (i.e., general waste, metal waste, paper waste, and cardboard waste) located in bays on the sides of the building. The western portion comprises the ASTs and vehicle parking. The northern portion has additional vehicle parking.

Facility Drainage Systems and Discharges

The facility is bordered by commercial buildings to the west and south along 114th Street, to the north along NW Aurora Avenue, and to the east along 109th Street (refer to Appendix D, Aerial Location). The entire facility grounds, except for a few grassy areas, were surfaced with concrete and asphalt. There was no precipitation during the inspection and no clear signs of storm water flow.

Permit Requirements and Potential Noncompliance Items

The EPA Inspection Team observed during the inspection, materials handling and storage areas, maintenance areas, and storm water drainage and conveyance areas of the facility. The following observations were made by the EPA Inspection Team pursuant to provisions of the permit.

Records Observations

"Each SWPPP shall identify all activities and significant materials which may potentially be significant pollutant sources. Each SWPPP shall include, at a minimum:

A narrative description of:..

> **a.(2).iii.** materials management practices employed to minimize contact of these materials with storm water runoff;…
> **a.(2).vi**. a description of any treatment the storm water receives."

Observation 1: The provided SWPPP did not provide a description of any treatment the storm water receives (refer to Appendix C, Exhibit 1).

Permit Part III.C.4.b (Storm Water Management Controls)

"Each facility covered by this permit shall develop a description of storm water management controls appropriate to the facility, and, implement such controls. The appropriateness and priorities of controls in a SWPPP shall reflect identified potential sources of pollutants at the facility. The description of storm water management controls shall address the following minimum components, including a schedule for implementing such controls:…

b.(7). Sediment and Erosion Prevention. The SWPPP shall identify areas which, due to topography, activities, or other factors, have a high potential for significant soil erosion, and identify measures to limit erosion."

Observation 2: The provided SWPPP did not address sediment and erosion protection (refer to Appendix C, Exhibit 1).

Facility Field Observations:

At the time of the inspection, the EPA Inspection Team made the following observations at the facility:

1. The facility's used oil storage was located in 55-gallon drums on spill pallets within the main building (refer to Appendix B, Photograph 1).
2. A sand storage shed was located along the facility's southern exterior wall (refer to Appendix B, Photograph 2). The sand storage shed was enclosed on three sides and covered by a roof. A tarp covered the sand inside of the shed.
3. Facility salt storage was located inside the facility's maintenance and storage garage (refer to Appendix B, Photograph 3). Bags of salt were stored on wrapped pallets and placed on shelving inside the garage.
4. Two storage dumpsters were located along the facility's southern border (refer to Appendix B, Photographs 4 and 5). The dumpsters were covered with tarps and no holes were observed. One dumpster housed landscaping debris and the other dumpster's contents were unable to be viewed.
5. The EPA Inspection Team observed Outfall 002 (refer to Appendix B, Photograph 6). The area around the outfall was clean and unobstructed.
6. A general waste compactor and storage container were located along the southern wall of the building (refer to Appendix B, Photographs 7 and 8). The green compactor was enclosed by the building bay and connected to a blue storage container. The facility representatives stated the blue container would be removed and replaced when full, as needed.
7. The EPA Inspection Team observed Outfall 003 (refer to Appendix B, Photograph 9). The area around the outfall was clean and unobstructed.
8. A 311-gallon double-walled diesel aboveground storage tank (AST) was located near the facility's Fire Pump House (refer to Appendix B, Photograph 10).
9. Along the facility's northern perimeter, a row of storm water catch basins stretched the length of the parking lot's curbs (refer to Appendix B, Photograph 14). The catch basins connected to the Urbandale MS4.
10. The facility's fueling station was located west of the building and covered (refer to Appendix B, Photograph 11). A 2,000-gallon double-walled AST contained diesel for fueling vehicles. The flow path from the AST leads to a storm water catch basin. Facility representatives stated a boom is placed around the basin when fueling. In Table 2 – Best Management Practices of the facility's SWPPP, it states "cover storm drains in the vicinity of the filling area during loading/unloading," (refer to Appendix C, Exhibit 1). At the time of the inspection, the EPA Inspection Team observed no boom or spill prevention around the drain, though no vehicles were actively fueling. All storm water outfalls and catch basins connected to the Urbandale

Municipal Separate Storm Sewer System (MS4) which connected to North Walnut Creek to the east and connected to Walnut Creek to the southwest.

11. The EPA Inspection Team observed Outfall 001 (refer to Appendix B, Photograph 15). The area around the outfall was clean and unobstructed. Inside the basin, there was an accumulation of grass clippings and trash (refer to Appendix B, Photograph 16).

Field Areas of Concern

Part VI.N (Proper Operation and Maintenance)

"The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit and with the requirements of SWPPPs. Adequate laboratory controls and appropriate quality."

Observation 3: The former vehicle maintenance facility (VMF)was located west of the main building (refer to Appendix C – Exhibit 1 Figure 2). Inside the VMF, the EPA Inspection Team observed two drains (refer to Appendix B, Photographs 12 and 13). Neither the facility representatives nor the EPA Inspection Team could determine where the drains connected or if the facility performed any maintenance on the drains.

Closing

At the conclusion of the inspection, the EPA Inspection Team held a closing conference with the facility representatives and discussed the preliminary findings and observations of the inspection. The EPA Inspection Team reiterated that all observations were preliminary and not compliance determinations. The closing conference began at 10:40 AM (CT) and concluded at approximately 10:46 AM (CT).