

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

UPS - IADES
2609 Dixon St
Des Moines, IA 50316
(515)-214-4774

EPA ID Number: IAD048553481

On

June 23, 2022

By

Eastern Research Group, Inc.

For

U.S. ENVIRONMENTAL PROTECTION AGENCY
Region 7
Enforcement and Compliance Assurance Division

1.0 INTRODUCTION

At the request of the Enforcement and Compliance Assurance Division/Chemical Branch/RCRA Section (ECAD/CB/RCRA) of the U.S. Environmental Protection Agency (EPA) Region 7, Eastern Research Group, Inc. (ERG) conducted a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) at UPS-IADES (UPS) in Des Moines, Iowa on June 23, 2022. The CEI was conducted under the authority of Section 3007(a) of RCRA, as amended. Throughout the CEI, data and information were collected to determine compliance with the applicable regulatory and statutory requirements. The inspection report and attachments present the results of the CEI.

2.0 PARTICIPANTS

UPS:

Matthew Linebach, Base Supervisor
Tom Blake, Facility Engineer

EPA Representative, ERG:

Janosh Wolters, Energy Engineer, Lead Inspector
Anshul Paripati, Chemical Engineer

3.0 INSPECTION PRECEDURES

After arriving unannounced at UPS at approximately 08:00, I performed a drive-by visual inspection of the facility and was unable to take a photograph of the main entrance due to heavy traffic. At the conclusion of the inspection, I took a photograph of the main entrance. During the drive-by, I did not note any areas of concern. I then entered the main entrance and was stopped by a security check point. I presented my inspector credentials to the security guard who ushered us to a parking spot. The security guard stated he would contact personnel from the facility's environmental department. Mr. Tom Blake arrived in approximately 10 minutes. I introduced myself to Mr. Blake, Engineer. I explained my reason for being on site is to conduct a RCRA CEI and asked to meet with the facility personnel who manages hazardous waste on site. While Mr. Blake was knowledgeable about the wastes generated on site, he stated Mr. Linebach, the Base Supervisor would have more knowledge on waste generation, management, transportation off site, and the location of hazard waste profiles. Mr. Blake guided us to the break room. I initiated the opening conference with Mr. Blake present as UPS's representative. I presented Mr. Blake with my inspector credentials and business card, as well as the business card of the EPA Task Order Contracting Officer Representative, Mr. Trevor Urban. Mr. Paripati explained he has not obtained a RCRA credential and was observing the inspection for training purposes. I then presented a copy of RCRA Section 3007(a), which contains EPA's inspection authority. I explained my need to collect accurate information and presented them with a copy of Title 18 U.S. Code, Sections 1001 and 1002. I then presented Mr. Blake with a copy of the *Notice Regarding Proprietary/Confidential Business Information Submitted to or Collected by EPA in Connection with Inspections* and reviewed UPS's confidentiality rights. I informed Mr. Blake that I would provide a *Confidentiality Notice* at the end of this inspection.

The inspection consisted of a discussion of facility operations, waste generation and waste management, a review of waste management records, and a visual inspection of the waste generation and management areas.

During the visual inspection of the facility, Mr. Blake guided us throughout the facility in order to conduct thorough evaluations of the facility's areas generating and accumulating hazardous waste. The facility also handles universal waste in a designated on-site area, which was also visually inspected. UPS has a parts washer; however, they are no longer used. I conducted an in-depth visual inspection of the hazardous waste accumulation containers, used oil storage areas, and the universal waste storage area on site as labeled on the facility layout (see Attachment 1).

After the opening conference, we began the visual inspection and Mr. Linebach joined us for the remainder of the inspection. Mr. Linebach provided us with records of the hazardous waste manifests, universal waste manifests, off-site transfer of used oil, and the procedure for labeling hazardous waste drums.

Seven photographs were collected as inspection documentation and are shown in Attachments 2 and 3. Information collected during the inspection is documented on the *EPA Inspection Checklist* (see Attachment 4). I followed the inspection procedures discussed in the RCRA CEI Standard Operating Procedure (No. 2321.01D), unless noted differently. At the conclusion of the inspection, I provided Mr. Linebach with a *Confidentiality Notice* and *Receipt for Documents*

and Samples which he signed as acknowledgement of receipt (see Attachments 5 and 6 respectively). No confidentiality claims were made by UPS. No findings were observed at the time of the inspection. Therefore, a Notice of Preliminary Findings was not left with UPS. Based on the EPA RCRA Record, UPS has not been previously inspected.

The following inspection documents and compliance assistance handouts were left with UPS:

RCRA Section 3007(a)

Title 18 U.S. Code, Sections 1001 and 1002

Notice Regarding Proprietary/Confidential Business Information Submitted to or Collected by EPA in Connection with Inspections

Confidentiality Notice (Facility copy)

Receipt of Documents and Samples (Facility copy)

Security Awareness

Commercial Motor Vehicle Transportation

Security Planning

EPA E-Manifest Fact Sheet U.S.

EPA Small Business Resources

U.S. EPA Publication, Managing Your Hazardous Waste

U.S. EPA Publication, Managing Used Oil-Advice for Small Businesses

PowerPoint Presentation, 2013 Solvent Wipes Final Rule

Pollution Engineering Article, 10 Common Questions for Waste Generators

Iowa Department of Natural Resources (IDNR) Waste Exchange Folder and P2 Brochures

IDNR Management of Fluorescent Lamps for Businesses Information Sheets

IDNR Aerosol Can Disposal for Businesses Information Sheet

University of Northern Iowa Waste Reduction Center Information Card

Solvent-Contaminated Wipes Final Rule Summary Chart

4.0 FINDINGS AND OBSERVATIONS

4.1 Facility Information and Operations

UPS began operation in 1972 and currently employs approximately 750 people. The facility operates three, 8-hour shifts, seven days per week. UPS both owns and operates approximately 100,000 square feet of space across all buildings. Facility operations include the transportation of packages and there are no major raw materials used. The following waste streams are produced: ignitable waste, corrosive waste, U listed waste, used oil/used oil filters, aerosol cans, parts washer solvent, scrap metal, universal waste, and general trash.

4.2 RCRA Status

According to the *Hazardous Waste Site Info Verification Report for Inspector* (see Attachment 7), UPS notified as a federal Small Quantity Generator (SQG)(greater than 100 kilograms(kg)/month but less than 1,000 kg/month) of the following hazardous wastes: D001, D002, D003, D007, D008, D016, D018, D019, D021, D028, D029, D035, D039, P075, U002, U057, U080, U122, U123, U134, U154, and U240. I asked Mr. Blake to review the *Hazardous Waste Site Info*

Verification Report for Inspector, which I provided during the inspection. Mr. Blake indicated there were no updates needed. After reviewing the records and walking through the facility, I determined that the facility is operating as a federal SQG of D001, D002, D003, D007, D008, D016, D018, D019, D021, D028, D029, D035, D039, P075, U002, U057, U080, U122, U123, U134, U154, and U240 hazardous waste, a generator of used oil, and a small quantity handler of universal waste. I made the updates to the form as shown in Attachment 7.

4.3 Facility Waste Streams and Management

A Waste Stream and Waste Handling Table for UPS is presented below. The table describes waste streams generated, generation process/rates, hazardous waste determinations, and on-site/off-site management.

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#	WASTE STREAM	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
1	Ignitable Waste	Leaking packages	D001 Hazardous (based on process knowledge and knowledge of the product)	1,400 pounds per year	55-gallon container	Veolia ES Technical Solutions (Veolia) (NJD080631369) in Flanders, NJ to Veolia ES Technical Solutions in Sauget, IL (ILD098642424) for incineration or fuel blending
2	Corrosive Waste	Leaking packages	D002 Hazardous (based on process knowledge and knowledge of the product)	90 pounds per year	55-gallon container	Veolia ES Technical Solutions (NJD080631369) in Flanders, NJ to Veolia ES Technical Solutions in Sauget, IL (ILD098642424) for incineration or fuel blending
3	U Listed Waste	Unused materials	Hazardous (based on process knowledge and knowledge of the product)	170 pounds per year	55-gallon container	Veolia ES Technical Solutions (NJD080631369) in Flanders, NJ to Veolia ES Technical Solutions in Sauget, IL (ILD098642424) for incineration or fuel blending
4	Used Oil	Facility maintenance of vehicles	Excluded (managed as used oil per 40 CFR 279)	1,160 gallons every two months	1,160 gallon above ground storage tank	Sent off site to Growmark in Council Bluffs, IA (IAD991286014) for recycling (Invoice included in Attachment 8)
5	Used Oil Filters	Hot punctured and drained used oil filters from vehicle maintenance	Excluded (based on management and process knowledge) recycled as scrap metal	One 55-gallon container every two months	55-gallon container	Sent of site to Growmark in Council Bluffs, IA (IAD991286014) for recycling.

#	WASTE STREAM	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
6	Spent Aerosol Cans	Facility maintenance (used until RCRA empty and added to general trash)	Nonhazardous (based on process knowledge and knowledge of the product)	Unknown, not tracked at facility but estimated less than 5 aerosol cans per month	40-yard container	Aspen Waste Systems in Des Moines, IA to Metro Park East Landfill in Mitchellville, IA for landfills
7	Parts Washer Solution (SDS included in Attachment 9)	Cleaning oil and lubrication off small maintenance tools	Nonhazardous (based on process knowledge and knowledge of the product)	Less than 10-gallons per year prior to no longer being used in 2022	In parts washer	Veolia ES Technical Solutions (NJD080631369) in Flanders, NJ to Veolia ES Technical Solutions in Sauget, IL (ILD098642424) for incineration or fuel blending
8	Scrap Metal	Facility maintenance on vehicles	Excluded (based on management and process knowledge) recycled as scrap metal	5-yard container picked up twice a week	5-yard container	Alter Metal Recycling in Des Moines, IA (IAD981501695) for recycling
9	Wastewater	Facility washing of delivery trucks	Nonhazardous (based on process knowledge and knowledge of the product)	200,000 gallons per month	Discharged via sanitary sewer to Des Moines Metropolitan Wastewater Reclamation Authority	Discharged via sanitary sewer to Des Moines Metropolitan Wastewater Reclamation Authority
10	General Trash	Facility operations	Nonhazardous (based on process knowledge and knowledge of the product)	40-yard container picked up once every two weeks	40-yard container	Aspen Waste Systems in Des Moines, IA to Metro Park East Landfill in Mitchellville, IA for landfills

4.4 Less-Than-180-Day Hazardous Waste Accumulation Area

UPS has one CAA located outside of the northern portion of the facility's warehouse shown on the facility layout (see Attachment 1). At the time of the inspection, there were a total of six 55-gallon containers in the facility's CAA accumulating hazardous waste. The wastes observed were ignitable waste, ignitable reactive waste, formaldehyde buffer solution, waste nicotine, and methyl ethyl ketone. Section 4.5 of this report explains how wastes are generated on site. The facility manages the CAA in a separate shipping container outside. The containers were labeled and being managed as hazardous waste. Mr. Linebach stated Veolia picks up waste as needed and the facility does not accumulate more than 20 hazardous waste drums at once. In addition, Mr. Linebach stated the facility has shipped off approximately 1,600 pounds of hazardous waste in 2022 and a total of 6,951 pounds in 2021. Mr. Linebach stated Veolia then comes once a quarter and picks up between five and 20 barrels for disposal. During records review, Mr. Linebach showed me an excel spreadsheet that tracks all waste shipments off site. The excel spreadsheet shows weight, waste profile, ID number, and manifest number that is used to ship each respective waste off site. A screenshot of this tracking sheet is provided in Attachment 10.

UPS is responsible for correctly marking 55-gallon hazardous waste containers with all proper labeling requirements. At the time of the inspection, the 55-gallon containers observed were closed, in good condition, labeled as "Hazardous Waste", indication of the nature of the hazard, and had accumulation start dates on each container. The oldest accumulation start date observed was "3/29/2022" and was a 55-gallon container of ignitable waste. Photographs were taken of the CAA as an example of how waste is accumulated in the CAA (see Attachment 3, Photos 1-3).

During the visual inspection of the hazardous waste CAA, I observed posted emergency preparedness information, and emergency contact information posted inside the CAA container. In addition, the facility had signage stating instructions for proper management of the CAA. Mr. Linebach stated only adequately RCRA trained individuals have access to the CAA and carry radios with them at all times. I asked Mr. Linebach if the facility inspected the CAA. Mr. Linebach stated the CAA is inspected weekly and provided examples during the records review portion of the inspection. I reviewed the CAA logs and a copy of a CAA log is provided in Attachment 11 as an example. I reviewed all other 180-Day Hazardous Waste Accumulation Area management requirements, and no findings were noted.

4.5 Visual Inspection

Leaking Packages:

UPS only generates hazardous waste from managing shipments containing materials that would be considered hazardous waste when spilled or leaked from their original packaging. UPS does not conduct any manufacturing on site. The facility is strictly a sorting and shipment center for

packages shipped with UPS. Throughout the sorting and transfer stages of the process, packages may break causing hazardous materials such as paint or cleaning chemicals to leak.

Mr. Linebach stated once a package is noticed to be leaking, only his team of RCRA trained associates are called to handle these packages. The package is opened, and the area is cleaned up immediately with absorbent. The package and all other cleaning supplies are collected in 55 gallon containers and managed as hazardous waste. Mr. Linebach explained that all cleaning supplies and wastes are solid when placed inside the 55-gallon container. Mr. Linebach explained the facility then contacts Veolia ES Technical Solutions to help with determining how the materials should be handled prior to pick up. For each individual package that leaks, a temporary profile is created. A "Damaged Material Form" is filled out by personnel. This form is provided in Attachment 12 as an example. Mr. Linebach stated the facility always assumes worst case and manages the waste as a hazardous waste if there is a slight possibility of being a hazardous waste. Veolia reviews the facility's determination and makes recommendations of how the waste should be handled and how containers should be labeled prior to pick up. Mr. Linebach reviews recommendations received from Veolia on a "Container Information Form". A *Container Information Form* is provided in Attachment 13 as an example. In addition, Veolia provides a "Damaged Material Form Confirmation" which indicates Veolia has also determined the waste to be a hazardous waste. Additionally, Veolia tracks the location and approximate level of each on site waste container. Veolia also provides UPS with technical direction on what types of materials can be co-mingled or added to a specific waste container. This ensures new containers are generated when new wastes are generated and that incompatible wastes are never comingled. Lastly, this management practice guarantees all hazardous waste on site is accumulated safely prior to being hauled off site. The confirmation form is provided in Attachment 14 as an example. I asked Mr. Linebach what happens if the waste determines differ between UPS and Veolia. Mr. Linebach stated although this is extremely rare, UPS could send a sample to be analyzed or Mr. Linebach would contact Veolia and speak to their personnel to ensure everyone is on the same page. From here, UPS would then use SDS, product knowledge, and potential analytical reports to ensure the wastes are managed properly. UPS manages each ID created for a leaked package separately and documents it within a folder to include SDS, analytical testing report (if applicable), Veolia review, damaged material notification, waste profile, and the original manifest of the material being shipped off site. I reviewed these folders for wastes being shipped off site for the previous three years. It appeared the facility was making every effort to make adequate waste determinations on all leaking packages observed on site.

Parts Washer:

UPS has one parts washer located in the maintenance shop that has been used in the past for occasional cleaning of small maintenance tools (see Attachment 3, Photo 4). However, Mr. Linebach stated the parts washer has not been used in over a year and the facility plans to haul off the spent parts washer solution that is contained in the parts washer. Historically, Veolia would provide parts washer solution and service the parts washer once per year. The parts washer solution is nonhazardous and was managed as a nonhazardous waste. The parts washer is

used to clean off oils and lubricants off small maintenance tools. The SDS for the parts washer solution is provided in Attachment 9.

Used Oil:

Used oil is generated from vehicle maintenance on delivery trucks and other vehicles used on site. During maintenance activities, containers varying from one gallon to five gallons are used as transfer containers into the facility's used oil tank. Mr. Linebach explained used oil is only accumulated in smaller containers during maintenance activities and upon conclusion of the activities, the used oil is immediately placed into the used oil tank. Used oil is accumulated in a 1,160-gallon tank located in the maintenance shop (see Attachment 3, Photo 5). The container was closed, in good condition, and labeled "Used Oil". Used oil is picked up approximately once per month by Growmark in Omaha, NE for recycling. An invoice for the same company that manages used oil is provided in Attachment 8.

POTW:

The facility discharges wastewater generated from washing delivery trucks. During records review, I reviewed the facility initial request to discharge wastewater to the Des Moines Metropolitan Wastewater Reclamation Authority. Mr. Paul Ebert provided a letter indicating he reviewed the chemical agent used for cleaning and determined the facility could discharge wastewater from this process via sanitary sewer. In addition, I reviewed the facility's current discharge agreement which was renewed on 6/1/2022. Mr. Linebach explained the facility has not changed the chemical used for cleaning or added any additional chemical agents to this process. The initial letter and discharge agreement is provided in Attachment 15.

Scrap Metal:

UPS manages small amounts of scrap metal on site. The scrap is generated from serviced and maintenance of delivery trucks and other vehicles. Once the servicing is complete, the scrap metal is accumulated in two 5-yard containers which are picked up weekly.

Universal Waste:

UPS manages a small amount of universal waste on site. I observed one small cardboard box located next to the environmental office accumulating used batteries. Additionally, I observed two 4-foot cardboard boxes of universal waste lamps during my visual inspection (see Attachment 3, Photo 6). The containers were labeled as universal waste batteries or universal waste lamps, closed, and dated with the start accumulation date. The earliest accumulation start date observed on the universal waste containers was January 22, 2022, which was present on the 4-foot cardboard box of universal waste lamps and is within one year of the inspection date. I did not note any issues or findings at the universal waste accumulation area.

4.6 Other Regulatory Requirements

Preparedness, Prevention, and Emergency Requirements - Safety and emergency equipment were present and in satisfactory condition. Emergency preparedness information was posted in the CAA and in operations areas throughout the facility. The information was up-to-date and accurate.

I reviewed the preparedness, prevention, and emergency requirements and no findings were noted.

Manifest and Land Disposal Restriction (LDR) Requirements – UPS maintained records of manifests dating back three years on site. I reviewed the 12 manifests from the past three years. A manifest and LDR form is provided in Attachment 16 as an example. As explained in Section 4.5 of this report, manifests are tracked with each respective waste profile created. An example of how this is tracked is provided in Attachment 17.

I reviewed all other manifest and LDR requirements and no findings were noted.

5.0 SUMMARY OF FINDINGS

I observed no issues or findings during this inspection. However, further EPA review may add findings.

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Wolters
Date: 2022.08.16 11:11:10
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Janosh Wolters
Energy Engineer
Date: August 16, 2022

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Date: 2022.08.19 15:22:31 -05'00'

Amber Whisnant
Section Chief
ECAD/CB/RCRA, EPA Region 7
Date: _____

Attachments:

1. Facility Layout (1 page)
2. UPS- IADES Photolog (1 page)
3. UPS- IADES Photos (7 Photos/8 pages)
4. EPA Inspection Checklist (22 pages)
5. Confidentiality Notice (1 page)
6. Receipt for Documents and Samples (1 page)
7. Hazardous Waste Site Information Verification Report (1 page)
8. Used Oil Invoice (1 page)

9. Parts Washer Solution SDS (3 pages)
10. UPS Waste Tracking (1 page)
11. CAA Log (1 page)
12. Damaged Material Form (1 page)
13. Container Information Form (1 page)
14. Damaged Material Form Confirmation (1 page)
15. Wastewater Discharge Agreement (3 pages)
16. Manifest (3 pages)
17. Tracking Sheet for Manifest (1 page)