

Compliance Evaluation Inspection Report

U.S. Postal Service – Yonkers Post Office

Yonkers, New York
November 15, 2022



Written by:

**X James
Sullivan**

Digitally signed by James
Sullivan
Date: 2022.12.12
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Enforcement Officer
ECAD-CAPSB-CAS USEPA R2

Approved by:

**X KATHLEEN
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BOGUSKY**

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Date: 2022.12.12 14:14:37
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Chief - Compliance Assurance Section
ECAD-CAPSB-CAS USEPA R2

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COMPLIANCE EVALUATION INSPECTION REPORT

U.S. Environmental Protection Agency, Region 2
Enforcement and Compliance Assurance Division
290 Broadway, 21st floor
New York, New York 10007-1866

Locational Information:

Facility Name: U.S. Postal Service – Yonkers Post Office
Facility Address: 79-81 Main St, Yonkers, New York 10701
Latitude & Longitude: 40.93468; -73.901452

Environmental Sensitivity Information:

Potential Flood-Prone Area: Yes (See Appendix B: FEMA Flood Map)
Sole Source Aquifer: No (See Appendix C: Sole Source Aquifer Map)
Potential EJ Concerns: Yes (See Appendix D: EJ SCREEN)

Sector Information:

Federal Facility: Yes
NAICS Code: 491110 - Postal Service

ICIS & other Program ID Codes:

FRS ID: 110001587079
RCRA ID: NY2180000232

Date of Inspection: November 15, 2022
Inspector(s): Jim Sullivan

Facility Representative(s):

Name	Title	Phone	Email
Matthew Wineski	Supervisor		Matthew.R.Wineski@usps.gov

Updates for EPA Databases: None.

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1. INTRODUCTION

On October 25, 2022, the Region 2 Office of the Environmental Protection Agency (EPA) inspected the U.S. Postal Service's Yonkers Post Office located at 79-81 Main Street in Yonkers, New York. The purpose of this inspection was to evaluate the facility's compliance with the Resource Conservation and Recovery Act (RCRA) requirements for hazardous waste management. The inspection was unannounced.

I arrived at the Yonkers Post Office (YPO) and after being redirected downstairs by the Postal Inspectors, I met Mr. Matthew Wineski, Supervisor of the YPO. I informed Mr. Wineski that I had a camera and would likely be taking pictures. Thus, if there were any areas that contained confidential business information, he should let me know prior to my taking the picture.

The YPO is a two-story stone building built in the late 1920s and is listed on the National Register of Historic Places (See, Photograph #1). The employees sort mail with zip codes between 10701 and 10710 for delivery, which include towns like Eastchester, Hastings-on-Hudson, Tuckahoe, Bronxville, as well as Yonkers.

Mr. Wineski has been at this location for seven years, but his understanding of the history of the site is that approximately fifteen years ago a high-volume sorting operation was located at the YPO. The remaining evidence of that operation are areas of the floor that have been refurbished where one can deduce a heavy piece of machinery previously resided, large gauge wiring remaining on the ceiling and enclosed overhead walkways for postal inspectors to view the operations unseen by the workers below. Those high-volume sorting operations have been taken up by the regional processing center on Westchester Ave in White Plains.

While the YPO was operating as a high-volume sorting facility there would have been sorting equipment and conveyor belts that needed lubricating oil, hydraulic oil, and solvent cleaning for parts; however, since those operations have ceased, the facility does not generate these types of waste anymore. The remaining activities at the YPO are the retail window, hand sorting, loading of delivery trucks, offices for postal inspectors and storage.

According to the E-manifest database there has only been one manifest emanating from YPO in the past three years. It was 50-lbs of solid lead waste (i.e., D008) shipped on 8/20/2021 via manifest 022848072JJK to Cycle Chem in Elizabeth, New Jersey. Based on the rate at which YPO generates hazardous waste, the facility is a very small quantity generator (VSQG).

2. FACILITY TOUR

Mr. Wineski and I began the facility tour in the mail sorting area. There were numerous stations that were used for hand sorting of mail prior to the mail being placed on a reusable mail tray then transferred over to the loading dock for loading onto light transport mail trucks for residential delivery. There is rolling stock that is used to transport mail trays and packages to the loading dock. Mr Wineski indicated that when these carts are damaged, they are sent to the White Plains location for repair (See, Photograph #2).

We then looked at the retail window and lobby of the YPO. From there we proceeded to the loading dock (See, Photograph #3). I asked Mr. Wineski whether there had been any leaks in the hydraulic systems of the docks and if so, how did they handle the spill. He indicated that there had not been any, but if there were, like almost every non-routine event at this site, it would be handled by the Postal Service's contractors.

Next, we proceeded to the basement. Mr. Wineski indicated that no employees worked in the basement and aside from storage, the area was inactive. The basement had to be inspected because this was where the facilities universal waste bulbs were stored. We did find a container of universal waste bulbs that was not labeled as "Universal Waste" and was not kept closed (See, Photograph #4). Stored near this container were emergency lighting units that Mr. Wineski said were not part of the Postal Service's normal maintenance of the building, but waste likely generated by a contractor involved in upgrading the building's fire suppression system. Three of these emergency lighting units were not containerized.

I also inspected a cage where the pushcarts that letter carriers use are repaired (See, Photograph #5); a meeting room that is available for training; the area where letter carriers were supposed to train on 9-unit mailboxes (the training project never launched) (See, Photograph #6); the area where the contractor upgrading the fire suppression system is keeping their supplies; another cage where painting supplies are stored (See, Photograph #7); the building's two gas-fired boilers (See, Photograph #8); and an auxiliary 1000-gallon vaulted tank of fuel oil that is drawn from if the gas supply is cut off (See, Photograph #9).

3. RECORD REVIEW

Based on a review of the manifests in the E-manifest system, YPO is a VSQG of hazardous waste. As noted above, the only hazardous waste shipment in the last three years went to Cycle Chem in Elizabeth, New Jersey. ACV Environmental Services was the transporter.

4. REGULATORY CONCERNS

Based on observations made during the inspection and a review of related records, the following regulatory concerns were observed:

REGULATORY, STATUTORY OR PERMIT REFERENCE	FIELD OBSERVATION
In accordance with 6 NYCRR 374-3.2 (d)(4)(i), a small quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions.	At the time of the inspection, at least one container of universal waste lamps was not closed (<u>See</u> , Photograph #4).

REGULATORY, STATUTORY OR PERMIT REFERENCE	FIELD OBSERVATION
In accordance with 6 NYCRR 374-3.2 (e)(5), each [universal waste] lamp or a container or package in which such [universal waste] lamps are contained must be labeled or marked clearly with one of the following phrases: Universal Waste-Lamp(s), or Waste Lamp(s), or Used Lamp(s).	At the time of the inspection, at least one container of universal waste lamps was not labeled or marked clearly with one of the following phrases: Universal Waste-Lamp(s), or Waste Lamp(s), or Used Lamp(s) (See, Photograph #4).

5. SUGGESTED BEST MANAGEMENT PRACTICES

Although not required for a VSQG, YPO should consider retaining the signed treatment, storage, and disposal facility (TSDF) copies of all hazardous waste manifests at the facility to assure the employees on-site that the waste arrived safely to its proper destination.

6. ENVIRONMENTAL ASSISTANCE

Based on the observations made during the inspection, the facility should consider the following resources to increase their understanding and compliance with applicable environmental requirements and/or go ‘beyond compliance’ to reduce its overall environmental footprint:

- Review the New York State Department of Environmental Conservation’s “Managing Your Hazardous Waste, A GUIDE FOR SMALL BUSINESSES IN NEW YORK.” The publication has an excellent description of the VSQG requirements (called a conditional exempt small quantity generator in the document). This publication can be found at: https://www.dec.ny.gov/docs/materials_minerals_pdf/nyshazwasteguide.pdf
- Bookmark FedCenter, the Federal government's home for comprehensive environmental stewardship and compliance assistance information for Federal facility managers and their agencies. Fed Center can be found at: <https://www.fedcenter.gov/>
- Bookmark the virtual Hazardous Waste Portal, which catalogs over 800 hazardous waste compliance resources, including guidebooks, fact sheets, reports, checklists, web sites, contacts, and regulations. Various features are available to assist users in finding the best guidance materials and answers to specific questions. The Hazardous Waste Portal can be found at: <https://www.hazwasteportal.org/>

APPENDICES:

A: Figures & Photographs

B: EJ Screen

C: FEMA Flood Map

D: Sole Source Aquifer Map

Appendix A: INSPECTION PHOTOS

Photograph #1 – U.S. Postal Service – Yonkers Post Office (Main Entrance)



Photograph #2 – Rolling stock. Orange tags are for repair orders.



Photograph #3 – Loading Dock



Photograph #4 – Universal Waste Lamps in storage



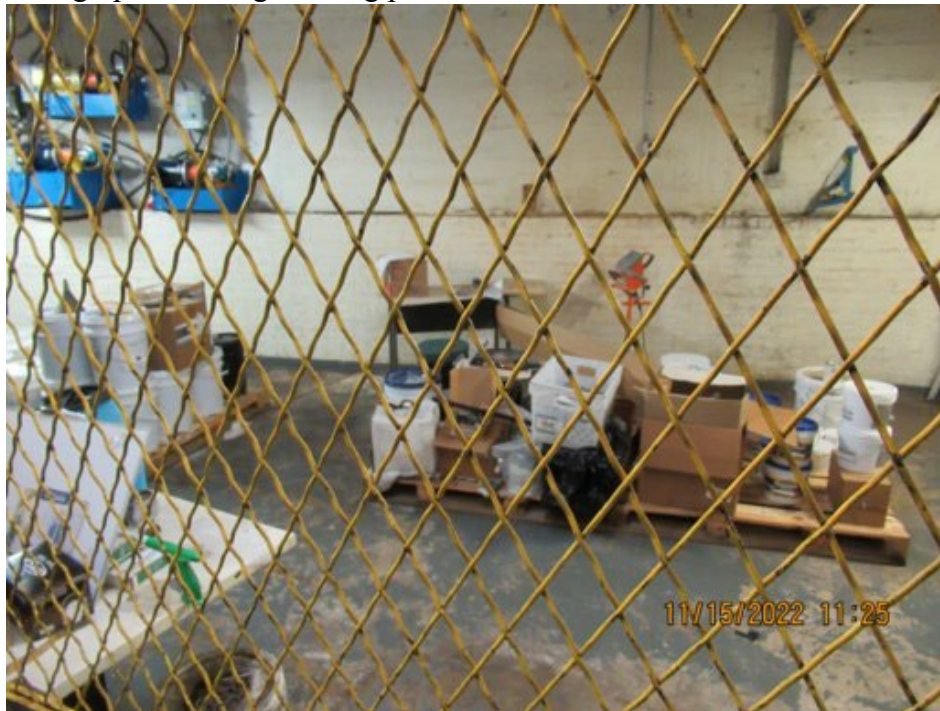
Photograph #5 – Cage for repair of satchel mail carts



Photograph #6 – Unused 9-unit mailbox training area



Photograph #7 – Cage storing paint related material



Photograph #8 – Boiler room



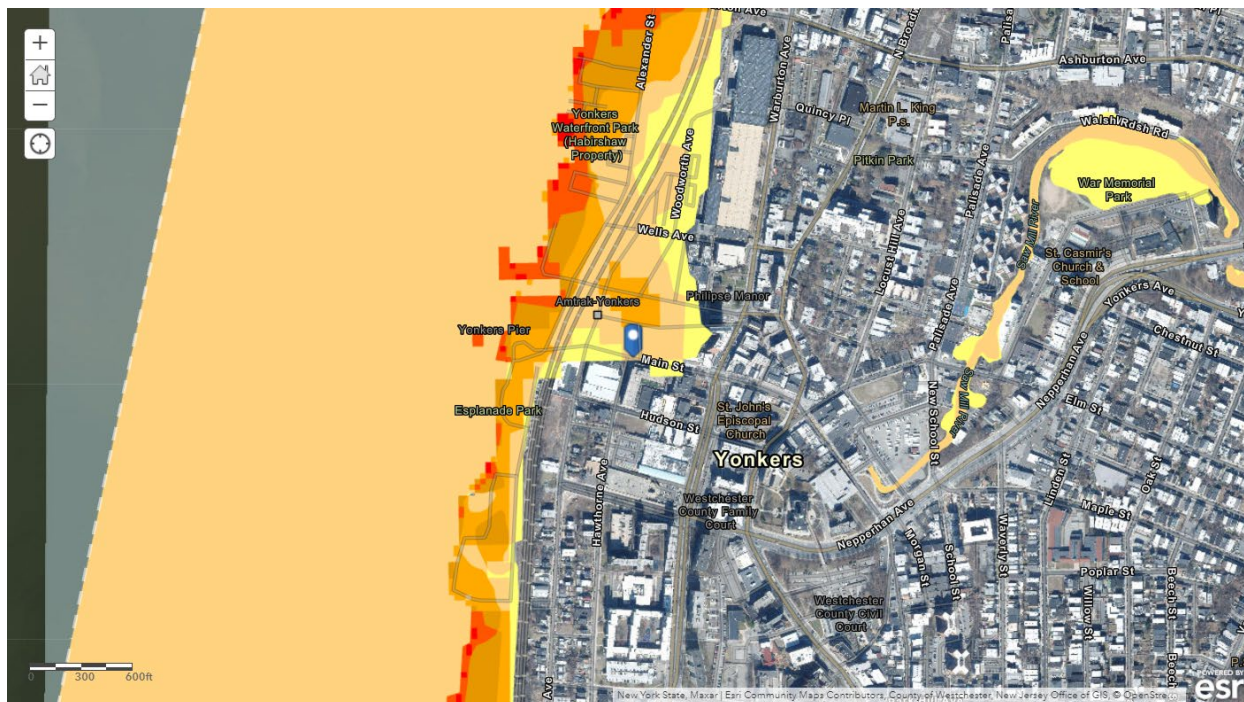
Photograph #9 – 1,000-gallon fuel oil tank located in basement



**Appendix B: Federal Emergency Management Agency (FEMA) 100 Year Flood Zone and
EPA's Region 2 Composite Flood Risk Layer**
Facility Name: U.S. Postal Service – Yonkers Post Office

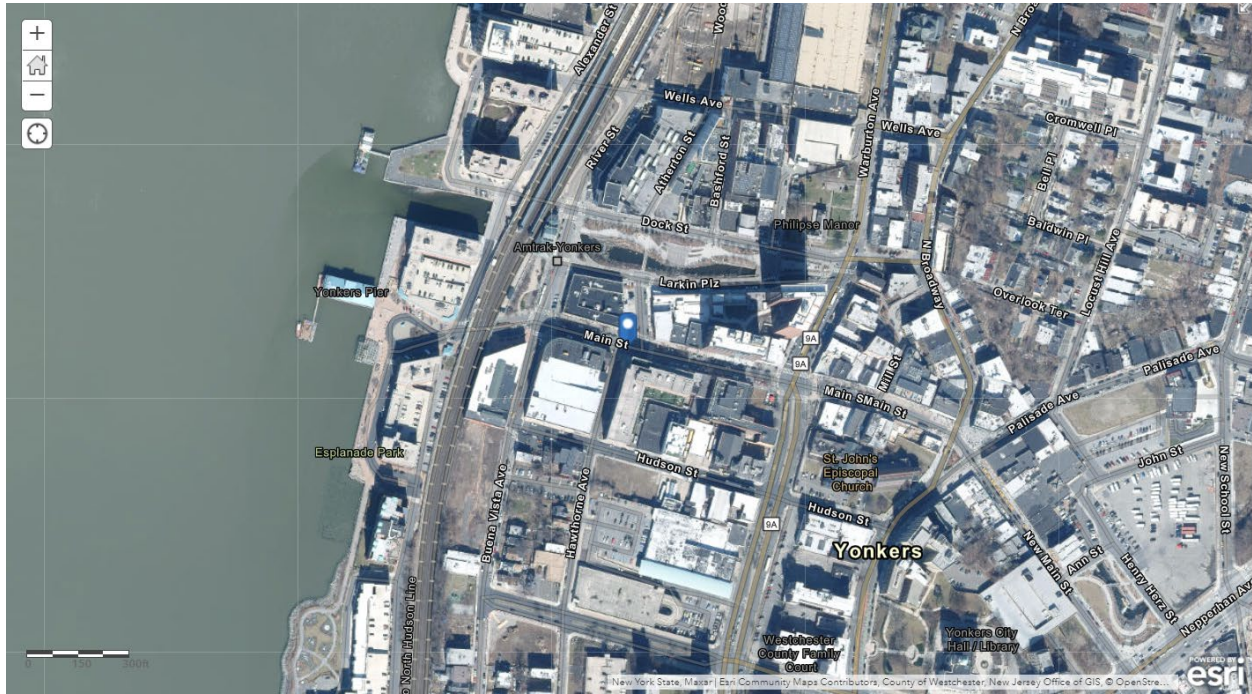


The facility is not located within a FEMA 100-year flood zone area.



The facility is located within the EPA's Region 2 Composite Flood Risk potential risk area.

Appendix C: Sole Source Aquifer Map
Facility Name: U.S. Postal Service – Yonkers Post Office



The facility is not located within a Sole Source Aquifer area.

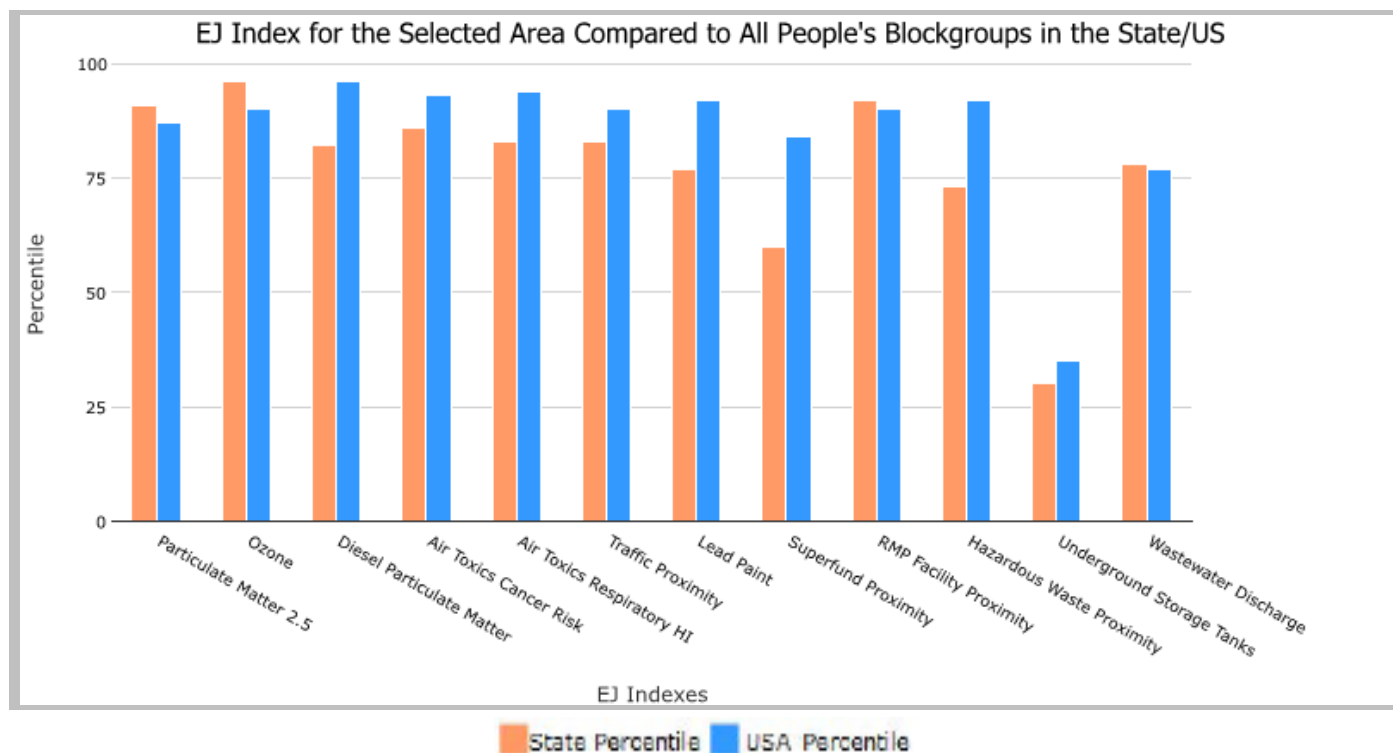
1 mile Ring Centered at 40.934679,-73.901451, NEW YORK, EPA Region 2

Approximate Population: 53,117

Input Area (sq. miles): 3.14

USPS - Yonkers (The study area contains 1 blockgroup(s) with zero population.)

Selected Variables	State Percentile	USA Percentile
Environmental Justice Indexes		
EJ Index for Particulate Matter 2.5	91	87
EJ Index for Ozone	96	90
EJ Index for Diesel Particulate Matter*	82	96
EJ Index for Air Toxics Cancer Risk*	86	93
EJ Index for Air Toxics Respiratory HI*	83	94
EJ Index for Traffic Proximity	83	90
EJ Index for Lead Paint	77	92
EJ Index for Superfund Proximity	60	84
EJ Index for RMP Facility Proximity	92	90
EJ Index for Hazardous Waste Proximity	73	92
EJ Index for Underground Storage Tanks	30	35
EJ Index for Wastewater Discharge	78	77



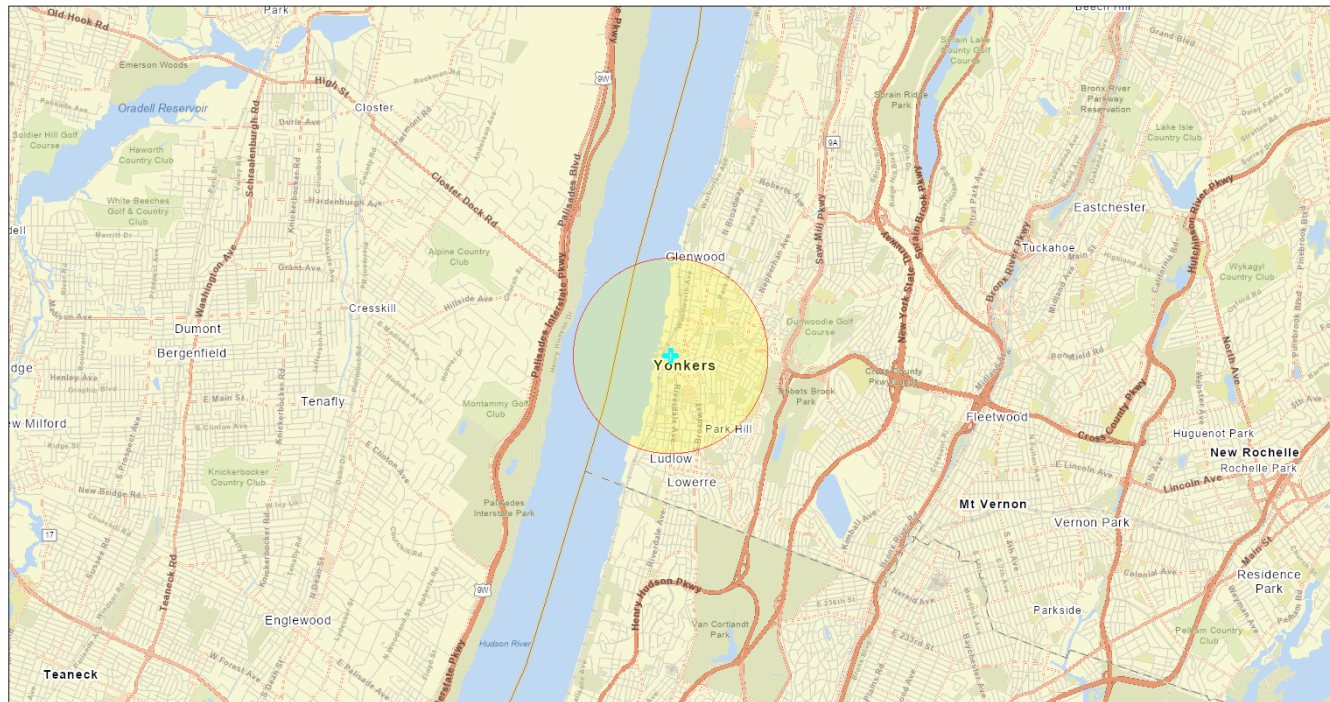
This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

1 mile Ring Centered at 40.934679,-73.901451, NEW YORK, EPA Region 2

Approximate Population: 53,117

Input Area (sq. miles): 3.14

USPS - Yonkers (The study area contains 1 blockgroup(s) with zero population.)



December 12, 2022

✚ USPS - Yonkers



County of Westchester, New Jersey Office of GIS, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, EPA, NPS, USDA

Sites reporting to EPA

Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	1

EJScreen Report (Version 2.1)

1 mile Ring Centered at 40.934679,-73.901451, NEW YORK, EPA Region 2

Approximate Population: 53,117

Input Area (sq. miles): 3.14

USPS - Yonkers (The study area contains 1 blockgroup(s) with zero population.)

Selected Variables	Value	State Avg.	%ile in State	USA Avg.	%ile in USA
Pollution and Sources					
Particulate Matter 2.5 ($\mu\text{g}/\text{m}^3$)	8.97	7.86	79	8.67	61
Ozone (ppb)	43.3	41.5	81	42.5	60
Diesel Particulate Matter* ($\mu\text{g}/\text{m}^3$)	0.7	0.637	59	0.294	90-95th
Air Toxics Cancer Risk* (lifetime risk per million)	34	29	81	28	80-90th
Air Toxics Respiratory HI*	0.46	0.39	69	0.36	80-90th
Traffic Proximity (daily traffic count/distance to road)	680	870	65	760	73
Lead Paint (% Pre-1960 Housing)	0.53	0.54	44	0.27	75
Superfund Proximity (site count/km distance)	0.065	0.24	27	0.13	53
RMP Facility Proximity (facility count/km distance)	0.86	0.52	82	0.77	71
Hazardous Waste Proximity (facility count/km distance)	2.8	6	47	2.2	77
Underground Storage Tanks (count/km ²)	0.97	7.7	34	3.9	47
Wastewater Discharge (toxicity-weighted concentration/m distance)	0.0058	4	58	12	65
Socioeconomic Indicators					
Demographic Index	71%	35%	89	35%	90
People of Color	90%	45%	83	40%	89
Low Income	51%	29%	84	30%	81
Unemployment Rate	9%	6%	79	5%	79
Limited English Speaking Households	20%	8%	87	5%	93
Less Than High School Education	28%	13%	88	12%	89
Under Age 5	8%	6%	75	6%	73
Over Age 64	12%	17%	34	16%	36

*Diesel particulate matter, air toxics cancer risk, and air toxics respiratory hazard index are from the EPA's Air Toxics Data Update, which is the Agency's ongoing, comprehensive evaluation of air toxics in the United States. This effort aims to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that the air toxics data presented here provide broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. Cancer risks and hazard indices from the Air Toxics Data Update are reported to one significant figure and any additional significant figures here are due to rounding. More information on the Air Toxics Data Update can be found at: <https://www.epa.gov/haps/air-toxics-data-update>.

For additional information, see: www.epa.gov/environmentaljustice

EJScreen is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJScreen documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJScreen outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.