



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

Enforcement & Compliance Assurance Division

5 Post Office Square, Suite 100

Boston, MA 02109-3912

Subject: Inspection Report - Clean Water Act

Inspector: Michael Prescott, EPA Contract Inspector

Michael K.
Prescott

Digitally signed by
Michael K. Prescott
Date: 2023.01.05
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EPA Representative: Alex Rosenberg

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ALEX ROSENBERG
Date: 2023.01.05
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I. Facility Information

- A. *Facility Name:* United States Postal Service (USPS) Worcester Vehicle Maintenance Facility (VMF) (Facility)
- B. *Facility Location:* 4 East Central Street
Worcester, MA 01613
Latitude/Longitude: 42.265278°N, 71.794444°W
- C. *Facility Contact/s:* Harry Rix, VMF Manager
508-795-3707
- D. *ID No(s):* National Pollutant Discharge Elimination System
(NPDES ID) MANOE4023
Facility Registry Service ID 110070099388

II. Background Information

- E. *Date of inspection:* November 16, 2022
- F. *Weather Conditions:* Overcast with recent rain and snow, 44° F
- G. *US EPA Inspector(s):* Michael Prescott, EPA Contract Inspector
Michelle Coombs, Inspector, EPA Region 1
- H. *State/Local Representative(s):* None
- I. *Federally Enforceable Requirements Covered During the Inspection:*
- 40 C.F.R. Part 122, NPDES Regulations

III. Type and Purpose of Inspection

The purpose of the site inspection was to view the USPS VMF operations and areas outside buildings, hazardous material and oil storage and transfer operations, and vehicle maintenance activities that are potentially exposed to precipitation to evaluate compliance with the applicable regulations, the Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (MSGP), and the requirements for certifying "No Exposure" of industrial activities to stormwater.

IV. Disclaimer:

Unless otherwise noted, this report describes conditions at the Facility/property as observed by the EPA inspectors, and/or through records provided to and/or information reported to EPA by Facility and as understood by EPA. This report may not capture all operations and activities ongoing at the Facility and at the time of the inspection. This report does not make final determinations on potential areas of concern. Nothing in this report affects EPA's authorities under federal statutes and regulations to pursue further investigation or action/s.

V. Facility File Review

According to Federal Emergency Management Agency (FEMA) flood information and the local map, the Facility is not in a Flood Hazard Zone. Stormwater from the Facility yard enters the City of Worcester Municipal Separate Stormwater Sewer System (MS4) which drains/discharges into the Blackstone River Basin.

According to EPA's records, on July 12, 2022 (and previously on July 12, 2017), the Facility submitted into EPA's electronic NPDES eReporting tool (NeT) a No Exposure Certification (NEC) for Exclusion from EPA's MSGP. The Facility reported on the form a primary standard industrial classification code (SIC) of 4311, United States Postal Service. The Facility reported and certified industrial materials or activities are not exposed to precipitation, now or in the foreseeable future.

VI. In-Briefing

The inspectors arrived at the site at 12:30 p.m. and were greeted by Mr. Rix who has been the VMF Manager for about a year. The inspectors presented credentials and requested permission to enter the Facility and conduct the site inspection and Mr. Rix agreed. The inspectors explained the purpose of the inspection was to evaluate compliance with the requirements for certifying an MSGP NEC and discussed the federal industrial stormwater program, and specifically Sector P (Land Transportation and Warehousing) Facilities, in Part 8 of the 2021 MSGP. The inspectors informed Mr. Rix the site inspection would include a review of USPS VMF operations and areas outside buildings, hazardous material and oil storage and transfer operations, vehicle maintenance activities that are potentially exposed to precipitation, and runoff discharge points/outfalls.

Mr. Rix informed the inspectors the Facility is a federal government vehicle maintenance facility for USPS vehicles. He also reported no fueling of vehicles occurs at the Facility; instead, USPS staff fuel their vehicles at commercial gas stations.

The inspectors informed Mr. Rix photographs would be taken during the site walkthrough. The photographs that were taken are provided in the photograph log in Attachment A.

VII. Site Inspection

Mr. Rix escorted the inspectors throughout the Facility yard and VMF building. The site inspection started in the VMF building with a walkthrough of all the maintenance bays and hazardous material/oil and waste storage areas. The inspectors observed a room for oil storage that contained two 280-gallon aboveground storage tanks (ASTs) for new and used oil (see Photo 1) that appeared to be double-walled. Piping from each AST goes through the exterior wall where covered access ports are located. There were also four 55-gallon drums of oil in the room. No floor drains were present. The Facility did not have a Spill Prevention Control and Countermeasure (SPCC) Plan and did not appear to be subject to the SPCC regulations as total aboveground oil storage capacity observed during the inspection was approximately 800 gallons.

The inspectors observed trench drains inside the VMF building at the bay rollup doors. According to Mr. Rix, these drains, along with all the other drains in the building, were connected to an oil water separator in the basement parking garage that discharged to the sanitary sewer. A separate bay inside the building (see Photo 2) is used to hand wash vehicles with a hose and Simple Green cleaner and the floor drains in this bay discharge to the sanitary sewer. There were also spill kits in the VMF building and basement garage.

The inspectors then walked around the outside of the building and the perimeter of the parking areas looking for potential exposure of pollutants to stormwater and any signs of contamination. The inspectors noted the fuel island no longer had fuel dispensers (see Photo 9) and Mr. Rix guessed that they had been removed along with the underground storage tanks (USTs) around eight years ago. The fill and pump out ports for the new and used oil ASTs in the building were located on the outside of the building by the old fuel island and had covered spill buckets to contain drips and spills (see Photo 10). There were no signs of oil stains on the pavement below the spill buckets.

Rust stains on the pavement were present around the covered scrap metal dumpster that contained discarded metal auto parts (see Photos 3, 4, 5, and 8). The rust appeared to come primarily from the dumpster and not from the discarded auto parts. The inspectors also observed a covered trash dumpster and a covered shed for tires and auto parts near the scrap metal dumpster (see Photo 7).

The inspectors noted the stormwater drainage from the Facility went to storm drains in the parking lot (see Photo 6 for a view of the drain closest to the dumpsters and shed). No signs of an oil sheen were observed in the drain or in puddles in the parking lot closest to the VMF.

Vehicles awaiting maintenance are parked outside at the Facility. Mr. Rix reported that 90% of the vehicles are repaired within one or two days of being brought to the Facility for maintenance. The general fleet of vehicles is inspected for leaks every time they conduct routine maintenance.

VIII. Closing Conference

Following the site walkthrough, the inspectors reviewed certain issues and observations with Facility representatives and presented the following:

- Rust stains from the covered scrap metal dumpster that contained discarded metal auto parts was observed. The rust appeared to come primarily from the dumpster and not from the discarded auto parts.
- The fill and pump out ports for the new and used oil ASTs in the building were located on the outside of the building and had covered spill buckets to contain drips and spills. There were no signs of oil stains on the pavement below the spill buckets.
- Vehicles awaiting maintenance are parked outside where they are stored for approximately one or two days before being brought inside for repairs.

The inspectors exited the Facility at 2:00 p.m.

ATTACHMENTS:

Attachment A – Photograph Log