

RCRA Compliance Evaluation Inspection Report

1) **Inspector and Author of Report**

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2) **Facility Information**

United States Postal Service - Vehicle Maintenance Facility
6707 Winton Blount Boulevard
Montgomery, Alabama 36119-9351
Montgomery County
(334) 244-7533

EPA ID No.: ALR000018507

3) **Responsible Officials**

Ronald F. Clardy, Manager, Vehicle Maintenance Facility

4) **Inspection Participants**

Ronald F. Clardy, US Postal Service
Sarah N. Bethea, Alabama Department of Environmental Management
Raj Aiyar, U.S. EPA, Region 4

5) **Date and Time of Inspection**

April 20, 2021, 9:30 a.m.

6) **Applicable Regulations**

Resource Conservation and Recovery Act (RCRA) Sections 3002, 3004, 3005, 3007 and 3008,
(42 U.S.C. §§ 6922, 6924, 6925, 6927 and 6928);

40 Code of Federal Regulations (C.F.R.) Parts 260-266, 270, 273, 279

Alabama Hazardous Waste Management and Minimization Act of 1978. Ala code Regulations

§ 22-30-1-17-1 et seq., and rules 35-14-1 to 35-14-17 (2016 and 2018) of the Alabama Department of Environmental Management (ADEM) Administrative Code (ADEM Admin. Code).

As the State's authorized hazardous waste program operates in lieu of the federal RCRA program, the citations of those authorized provisions alleged herein will be to the authorized State program; however, for ease of reference, the federal citations will follow in brackets.

7) Purpose of Inspection

On April 20, 2021, inspectors from the U.S. Environmental Protection Agency, Region 4, and the Alabama Department of Environmental Management (ADEM) conducted an announced compliance evaluation inspection (CEI) at United States Postal Service - Vehicle Maintenance Facility, (hereinafter, "USPS" or the "facility") to determine its compliance status with the RCRA and the State of Alabama regulations.

8) Facility Description

USPS is located at 6707 Winton Blount Boulevard, Montgomery, Alabama. The facility consisted of the vehicle maintenance facility (VMF) located on approximately six acres and has approximately 16,400 square feet under roof. VMF services and repairs vehicle fleet that is operated by the USPS across seven counties in Alabama. The property is predominantly covered by asphalt parking lot and driveways. The parking lots are graded to direct surface water runoff towards stormwater catch basins which drain into the City of Montgomery Storm Sewer System. VMF currently has 11 employees and operates six days a week.

The City of Montgomery supplies the potable water and provides domestic waste service. USPS was inspected as a very small quantity generator (VSQG) of hazardous waste. The facility uses Safety Kleen Systems Inc. (TXR000081205) to pick up their used oil, used oil filters, antifreeze, brake fluids and spent universal lamps. USPS recycles their automotive batteries, scrap metals and used tires. Cintas launders their shop towels. There is no paint booth onsite and hence there is no spray paint activity onsite.

9) Previous Inspection History

USPS-VMF was last inspected by ADEM on June 22, 2011. No deficiencies were observed at the time of the inspection. There was no prior EPA inspection at this facility.

10) Findings

Inspectors arrived at the facility at 9:30 a.m. and were greeted by the facility personnel. The inspectors conducted a formal introduction, showed their credentials and explained the purpose of the visit. Mr. Ronald Clardy, Manager, Vehicle Maintenance Facility provided the inspectors a general description of the on-site activities at the facility. The inspectors were later accompanied by Mr. Clardy during the walk-through inspection of the facility.

Maintenance Workshop

The facility conducts repair and servicing of the USPS vehicles in this area. There were six

vehicles under repair and maintenance in the various service bays at the time of inspection. The inspectors observed an aerosol can puncturing device and a filter cannister mounted on a 55-gallon drum in secondary containment in the satellite accumulation area (SAA) (Picture-1). The drum was observed to be closed and labeled as "Hazardous Waste." The hazard indication on the drum was observed to be "Flammable" and "Toxic." The inspectors also observed a closed 55-gallon drum containing punctured aerosol cans located next to the 55-gallon SAA drum. According to Mr. Clardy, the punctured cans were managed as scrap. The inspectors observed a spill kit near the SAA.

The inspectors observed floor drains in the service bays with liquid in them that required cleaning. Mr. Clardy mentioned that Safety-Kleen was contracted to clean the drain trough once a year. According to Mr. Clardy, the floor drains located inside the VMF including the Lube Room, Service Bays and the Wash Bays are routed through an oil/water separator prior to release into the municipal sanitary sewer system. The drain oil/water separator was located outside near the southwest corner of the VMF building. The inspectors observed a parts washer in the service area. The equipment was not in use at the time of inspection. Mr. Clardy stated that the equipment was not in service. The inspectors observed a Model 26.1, Aqueous Brake Cleaner equipment. The equipment was not in service at the time of inspection. Mr. Clardy mentioned that the equipment was serviced by Safety-Kleen periodically. The inspector observed a 55-gallon used oil drum (Picture-2) on skids near one of the service bays. The drum was closed and labeled as "Used Oil for Recycling". Mr. Clardy said that Safety Kleen Inc. picked up their used oil for recycling purposes.

The next area inspected was the Battery Charging Room. The inspectors observed three automotive batteries being charged during the inspection at the battery charging terminal (Picture-3). There were three additional batteries waiting to be serviced in secondary containment. According to Mr. Clardy, spent lead-acid batteries are recycled through reclamation. The spent batteries are placed on the charger to see if they are rechargeable. Once charged the batteries are put back in service, if not, they are placed in storage until they are picked up by Interstate Battery Company for a one-to-one swap for rebuilding and reuse. The inspectors observed an eye wash station near the battery charging terminal. Mr. Clardy mentioned that the eye wash station was checked on a weekly basis.

The inspectors observed used tires and used antifreeze storage area adjoining the Battery Charging Room. The inspectors observed two 55-gallon drums labeled as "Used Antifreeze" in secondary containment (Picture-4). According to Mr. Clardy, Safety Kleen picked up their used Antifreeze. Used tires were picked up by a local company called "Day and Night". No hazardous waste was observed in this area.

The inspectors inspected the Lube Room. According to Mr. Clardy, the oil storage areas and containers are subject to the Spill Prevention and Countermeasure Plan (SPCC) requirement since they exceed the storage limit for SPCC requirement for oil storage in the VMF Building. The inspectors observed two aboveground storage tanks (AST #1 and AST #2) in the Lube Room. One 650-gallon tank is used to store "Used Oil", the other 650-gallon tank is used to store "Virgin Oil". According to Mr. Clardy, the aboveground storage tanks are double walled and equipped with level gauge for overflow prevention. The containment is provided by double walled construction. The transfer operations are conducted by flexible hoses. The inspectors

observed the 650-gallon used oil tank labeled as “Used Oil” and the tank containing new oil labeled as “Virgin Oil”. The inspectors observed oil stains in the floor covered by the shop absorbent- “Stardust” (Picture-6) near the base of the used oil tank. Mr. Clardy mentioned that there was an accidental spill during a routine pick up of used oil from the Lube Room last week. Mr. Clardy mentioned that spill was in the process of being cleaned up.

The inspectors observed several closed and labeled 55- gallon drums containing products also stored in the Lube Room. There was no leaks and spills near the product drums. The inspectors also observed a spill kit in the Lube Room. The spill near the used oil tank was later cleaned up before the inspection was concluded. The inspectors later verified the cleanup in the Lube Room prior to concluding the inspection.

12) Record Review

Based on the inspection, USPS appeared to meet the Very Small Quantity Generator (VSQG) status of hazardous waste. As a VSQG, USPS is required to meet only minimal recordkeeping requirements. The inspectors reviewed the facility’s Spill Prevention, Control and Countermeasures (SPCC) Plan dated June 23, 2017. The SPCC Plan must be reviewed every five years to include any changes in oil storage or spill prevention procedures or equipment at a facility.

13) Out-Briefing

An exit briefing was conducted at the conclusion of the inspection. Mr. Clardy participated in the exit briefing. The observations made during the inspection were discussed and the inspection was concluded.

14) Signed

Raj Aiyar
Environmental Engineer
RCRA Enforcement Section

Date

15) Concurrence

ARACELI
CHAVEZ

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Date: 2021.05.24 09:49:56
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Araceli B. Chavez
Chief
RCRA Enforcement Section

Date

Attachment A

UNITED STATES POSTAL SERVICE – VEHICLE MAINTENANCE FACILITY

Montgomery, Alabama

EPA ID # ALR000018507

APRIL 20, 2021

**Photos taken by Raj Aiyar
Camera Type: Samsung WB250F
EPA Tag Number: S75912**



Picture 1: SAA Drum, VMF



Picture 2: Used Oil Container on Skids, VMF



Picture 3: Battery Charging Room



Picture 4: Used Antifreeze in Secondary Containment



Picture 5: 650-gallon Used Oil Tank



Picture 6: Absorbent material covering the used oil spill



Picture 7: Used Oil Spill Cleaned during Inspection