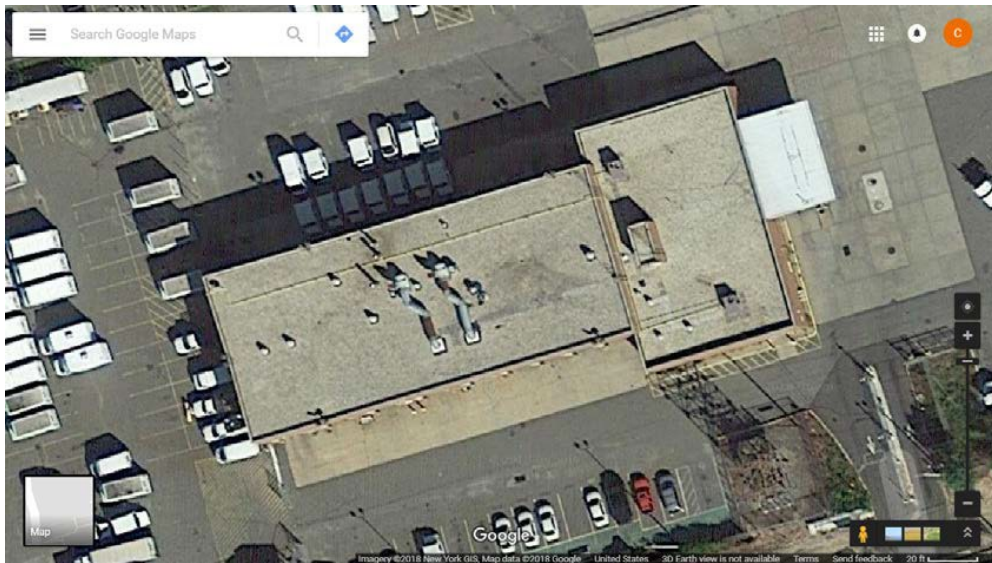


Compliance Evaluation Inspection Report
USPS Western Nassau Process & Distribution Facility &
Vehicle Maintenance Facility
830 Stewart Avenue
Garden City, NY
March 5, 2024



Written by:

X RONALD LOCKWOOD Digitally signed by
RONALD LOCKWOOD
Date: 2024.04.25
11:17:42 -04'00'

Enforcement Officer
ECAD-CAPSB-CAS USEPA R2

Approved by:

X KATHLEEN MALONE-BOGUSKY Digitally signed by KATHLEEN
MALONE-BOGUSKY
Date: 2024.04.25 11:33:34
-04'00'

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: USPS Western Nassau Vehicle Maintenance Facility (VMF)
Facility Address: 830-A Stewart Ave, Garden City, NY 11599-0001
Latitude & Longitude: 40.733582, -73.603274

ICIS & other Program ID Codes as appropriate

FRS: 110004325089
ICIS: 1800022326
RCRA HW: NY0180000408

Sector Information

Federal Facility: Yes
SIC: 4311 (U.S. Postal Service)
NAICS: 49111 (U.S. Postal Service)

Environmental Sensitivity Information

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

Inspection Information

Date of Inspection: March 5, 2024
Inspector: Ron Lockwood
Inspector-in-Training: Kevin Dyer

Facility Representative(s):

Name	Title	Phone	Email
Andrew W. Tolkach	Mgr. Vehicle Maintenance Facility	(516) 228-7609 /7068	andrew.w.tolkach@usps.gov
Ann Marie Byrnes, CPEA	Environmental Programs Analyst	516-228-7502	annmarie.byrnes@usps.gov

Corrections/Updates for EPA Databases: N/A

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1. INTRODUCTION

The Region 2 office of the Environmental Protection Agency (EPA) inspected this facility to evaluate its compliance under Subtitle C (hazardous wastes) and Subtitle I (underground storage tanks) of the Resource Conservation and Recovery Act (RCRA). The last RCRA Subtitle I compliance evaluation inspection was conducted on April 24, 2018, and, under the Energy Policy Act of 2005 (EPAct), inspections of all underground storage tank (UST) facilities are required every three years. The facility has no manifests in the eManifest system and is listed as a very small quantity generator (VSQG) of hazardous wastes.

A notification call was made to Ms. Byrnes the day before the inspection as she is the Environmental Programs Analyst for the U.S. Postal Service's Office of Sustainability that oversees environmental compliance at postal facilities in the New Jersey and lower New York area, including Nassau and Suffolk Counties. Inspector Ron Lockwood and Inspector-in-Training Kevin Dyer arrived at 11:00 AM, presented EPA credentials to Mr. Andrew W. Tolkach, Manager of the Vehicle Maintenance Facility, and Ms. Ann Marie Byrnes and offered in- and out-briefings, and the opportunity to claim confidential business information.

Ms. Byrnes and Mr. Tolkach provided the following facility background:

- There are approximately 26 employees who work in two shifts starting at 4:00 AM and ending at 11:30 PM.
- There is one 15,000-gallon UST, which was installed in 2020 and registered with the Nassau County Department of Health in 2022.
- The UST is constructed of double walled fiberglass reinforced plastic (FRP) as is all the piping.
- All sumps and spill buckets are double walled.
- There are no emergency generators.
- Universal waste consists of fluorescent bulbs, lithium batteries and car batteries.

I (Ron Lockwood) informed them that we would be visiting their universal waste storage areas as well as their UST and fuel dispensers.

I let them know that we would conduct a closing meeting following the on-site portion of the inspection to discuss any concerns noted during the facility tour and to explain the next steps in the inspection process, including the issuance of this written report. At this point I concluded the opening meeting and began the facility tour.

2. FACILITY TOUR

Hazardous Wastes

Spray Paint Booth – There is a spray booth that is used to touch up vehicles on occasion. The paints used are all water based. There were no open or used paint cans being stored at the time. There is a Safety-Kleen paint gun cleaner in the corner. The mixed spent solvent is collected in a satellite accumulation area in a 5-gallon steel double-walled (i.e., drum within a drum) container (See, Photo 1), which was labeled as “Hazardous Waste” with an accumulation start date of 4/7/22. No other information was listed on the label or provided by the facility as to what solvent is being used. The label states the solvent characteristic as flammable. The facility has not manifested any hazardous waste in over three years.

Universal Wastes

Lithium Batteries – Lithium batteries generated from small devices are collected in a 5-gallon pail located in a general use room (See, Photo 2). The area is clearly marked “Universal Waste Accumulation Storage Area” (See, Photo 3). There were no batteries being stored at the time of the inspection.

Vehicle Batteries – These batteries are stored outside in a gated shed (i.e., no walls) with a steel roof. The batteries are stored on plastic secondary containment pallets (See, Photo 4). No signage identifying the area as a universal waste storage area was observed. The two universal waste batteries being stored on the pallets were also not labeled as universal waste.

Fluorescent Lightbulbs – All bulbs are changed and managed by [Cleanlites](#). At the time of the inspection there were no universal waste bulbs stored or awaiting pick-up.

Used Oil

Used oil collected from empty containers and spent filters are collected in two 55-gallon steel drums (See, Photos 5 & 6). The drums are stored on top of secondary containment plastic pallets. There was no visible signage identifying that the area is used for storing used oil. Once the containers and spent filters are drained into the 55-gallon drums, they are then transferred to a 450-gallon steel above ground storage tank (AST), which was clearly labeled “Used Oil” (See, Photo 7). The 55-gallon drums used to store used oil drained from the filters and containers were not labeled “Used Oil.”

Underground Storage Tanks

Automatic Tank Gage – A Veeder-Root TLS-450 Plus automatic tank gauge (ATG) is installed to

monitor the 15,000-gallon UST. The ATG is located in the control room across from Mr. Tolkach's office. An audible alarm sounded when the overfill alarm test was performed (See, Photo 8). The ATG displayed a "WATER WARNING" alarm in the "DEF* Annular," which has been active since 11/14/2023 at 6:20 AM (See, Photo 9). Ms. Byrnes stated the alarm was due to a rain event that caused liquid to enter the interstitial space of the tank, and the liquid could not be pumped out until proper hazardous waste removal can be performed due to the possibility of contamination with diesel fuel. No scheduled date was given for the liquid removal.

*DEF consists of deionized water and urea, which help turn nitrous oxide into water and nitrogen. It is the key ingredient in starting the chemical reaction that keeps gases produced during diesel engine operation out of the environment. DEF is not regulated under the UST regulations.

Fill Pipe – The fill port for the UST is located just outside the eastern facing side of the building, within a bollard-protected area of the large surface lot. The fill port utilizes double-walled containment and a coaxial stage-1 vapor recovery system (See, Photo 10). Other overfill prevention devices includes an auditory overfill alarm (See, Photo 11) and an automatic shutoff device/flapper valve (See, Photo 12).

Sumps – The turbine sump for the UST is located just a couple feet south of the fill port. The sump is double walled (See, Photo 13) and contains a liquid sensor, which was propped up approximately 2 inches from the bottom of the sump (See, Photo 14). This issue was brought up with Mr. Tolkach and Ms. Byrnes and on 3/15/24 a photo showing the corrected sensor mounting was provided (See, Photo 15).

Dispensers – The facility contains two diesel dispensers located just a couple dozen feet Southeast of the fill port and sump. The interiors of the dispensers both have under-dispenser containment with liquid sensors properly installed (See Photos 16 & 17) and shear valves. The system utilizes pressurized piping to the dispensers and is free from debris or liquid build-up.

3. RECORD REVIEW

UST Registration - The 15,000-gallon fiberglass reinforced plastic (FRP) diesel UST was issued a registration permit by the Nassau County Department of Health (NCDOH) on 06/01/22. However, the NCDOH states the UST was put into service on 8/1/2020.

UST Class A, B, C Operator Training - Operator training records were provided for all Class A, B, and C operators with the following dates for their most recent training:

- Class A/B Operator – Andrew Tolkach, most recent training date 9/18/2023
- Class C Operators:
 - Stephan Ferrandino, 1/6/2022 – 26 years on job
 - Jason Rios, 1/6/2023 – 2 years on job

- William Thomas, 1/6/2023 – 3 years on job
- Havernach Davis, 1/6/2023 – 3 years on job
- Paul Stankowitz, 1/30/2024 – 1 year on job

Following the onsite inspection, I (Inspector Lockwood) asked Ms. Byrnes if the facility could provide training records for the Class A, B, and C operators to document they were trained when the UST Operator training requirements became effective on October 13, 2018, and/or when they assumed duties. Ms. Byrnes provided the Class A/B operator certificate for Joseph DiGenarro dated 2/2/2017. Mr. DiGenarro was the previous VMF manager prior to his retirement in 2022; at which point, Ms. Byrnes (a Class A/B operator since 11/2/2016) was the interim A/B operator until Mr. Andrew Tolkach completed his Class A/B operator training on 9/18/23. The first trained Class C operator was Mr. Stephen Farrandino, who was trained in 2017. Mr. Farrandino has been the facility's class C operator continuously since the requirement became effective.

All Class C operators take an "EPACT/Underground Storage Tank (UST) Class C Operator Training" using HERO, the USPS on-line training program. The course has a 10-question exam and requires 80% correct to receive a passing grade. All initial and retraining records can be retrieved from the EPACT/UST HERO training program upon request. Note: while retraining for Class C operators is not a requirement, USPS Class C operators can "refresh" their responsibilities when deemed necessary; hence, the 2022 training date noted above for Mr. Stephen Farrandino even though he was initially trained in 2017.

The facility keeps a hardcopy list of designated Class A, B, and C operators, along with training certificates for the Class A and B operators. One Class C operator, Paul Stankowitz, was absent from the printed list of facility operators. This was addressed with facility managers at the closing meeting and a corrected list was provided on 3/15/24 (See, Photo 18).

Annual UST Release Detection Equipment Testing – On 3/15/2024, via email, the facility provided annual release detection equipment testing records for the last three years, dated 06/06/2023, 5/25/2022, and 5/24/2021 conducted by WildoPES (third party). The annual operability tests of the release detection method's electronic and mechanical components included:

- Tank (interstitial monitoring, product inventory control)
- ATG
- Emergency Shutoff
- Annular Sensor
- Sump Sensor
- Automatic Line Leak Detector (ALLD)
- Spill Bucket(s) Integrity
- Overfill (Drop Tube with Flapper Valve, High Level Alarms – both external and internal)
- Piping Sump (Containment Sump, Fill Sump, Vent Sump)
- Dispensers (Shear Valve, UDC Sump Sensor, Containment Sump)

Passing test results for all areas are reported.

Monthly UST Walkthrough Inspection Records – Walkthrough inspection records reviewed on-site; however, August 2023, November 2023, December 2023, and February 2024 were missing. The missing walkthrough inspection records were emailed on 3/15/2024; however, the August 2023 report was missing page 2.

The monthly walkthrough records include the following:

Overfill – high level alarm testing (outside alarms and ATG alarm).

Spill Prevention/Containment - fill port obstruction, fill cap secure, sumps and spill bucket integrity and cleanliness.

UST Release Detection 30-day Monitoring Records- The results of the previous 12 months of release detection monitoring for both the tank and pressurized piping are kept in a binder as well as stored in the Veeder Root System. I reviewed the paper records onsite, which showed passing results. The release detection method used for the tank as noted above is an ATG and for the piping is interstitial monitoring.

4. CLOSING MEETING

Following the facility tour, Mr. Tolkach, Ms. Byrnes, Inspector-in training Kevin Dyer and I returned to Mr. Tolkach's office for the closing meeting. We discussed our observations and areas of potential concerns (See, Section 5 below). I explained that a report will be written covering the observations of the inspection, which will be sent to them within 70 days. This concluded EPA's inspection and Mr. Dyer and I left the facility.

5. REGULATORY CONCERNS

Based on observations made during the inspection and/or a review of records related to the inspection, the following regulatory concerns were identified under RCRA Subtitle C and RCRA Subtitle I:

REGULATORY, STATUTORY OR PERMIT REFERENCE	FIELD OBSERVATION
RCRA Subtitle C	
6 NYCRR 374-3.2 (e)(1) - Universal waste batteries (i.e., each battery), or a container in which the batteries are contained, must be labeled, or marked clearly with any one of the following phrases: "universal waste - battery(ies)," or "waste battery(ies)," or "used battery(ies)."	The two universal waste vehicle batteries being stored on the pallets in the gated shed were not labeled as universal waste – batteries or waste batteries or used batteries. Also, no signage identifying the shed being used to store universal waste vehicle batteries as a universal waste storage area was observed.

REGULATORY, STATUTORY OR PERMIT REFERENCE	FIELD OBSERVATION
6 CRR-NY 374-2.3 (c)(4)(i) - Every container and aboveground used oil tank used to store used oil at a generator facility must be clearly labeled or marked with the words "Used Oil". In addition, every aboveground tank used to store oil at a generator facility must be labeled with the design capacity and working capacity of the tank.	The 55-gallon drums used to store used oil drained from the filters and containers were not labeled "Used Oil"
RCRA Subtitle I	
40 CFR 280.35(1)(ii)(C). A liquid sensor is mounted and remains at the lowest point in the sump.	Liquid sensor inside double walled sump propped up approximately 2 inches from the bottom of the sump. <u>Corrective Action:</u> On 3/15/24 a photo showing the corrected sensor mounting was provided (See, Photo 15).
40 CFR 280.245(a): Owners and operators of USTs must maintain a list of designated operators, which, at a minimum, must (1) identify all current Class A, B, and C operators for the facility; and (2) include the names, Class of operator trained, date assumed duties, date each completed initial training, and any retraining	The facility keeps a hardcopy list of designated Class A, B, and C operators, along with training certificates for the Class A and B operator; however, at the time of the inspection, one Class C operator, Paul Stankowitz, was absent from the printed list of facility operators. <u>Corrective Action:</u> A corrected list was provided to EPA on 3/15/24 (See, Photo 18).

6. ENVIRONMENTAL ASSISTANCE

To increase the Federal community's understanding and compliance with applicable environmental requirements, EPA, along with other Federal agencies, sponsor Fed Center, the Federal government's home for comprehensive environmental stewardship and compliance assistance information for Federal facility managers and their agencies. Fed Center can be accessed via the worldwide web at <https://www.fedcenter.gov/>.

Also, as an owner and operator of an underground storage tank, you may want to download and review EPA's guidance document entitled "Must for USTs" at <https://www.epa.gov/ust/musts-usts>.

7. REQUESTED INFORMATION

Below are the documents and other relevant information that EPA is requesting to complete this compliance evaluation. Once received, the information will be reviewed.

- The identity of the spent solvent used to clean the spray guns. No manifests submitted for over three years and the only identifier on the label indicates a flammable hazardous waste.
- Update on the “Water Warning” in the DEF Annular active alarm that has been active since November 14, 2023.
- Clarification on why there is an 8/1/2020 date for the UST being put into service but the permit date is listed as 6/1/2022.

APPENDICES:

A: Photographs

B: FEMA Flood Map

C: Sole Source Aquifer Map

D: EJ Screen

Photo 1



05/03/2024 12:58

Photo 3

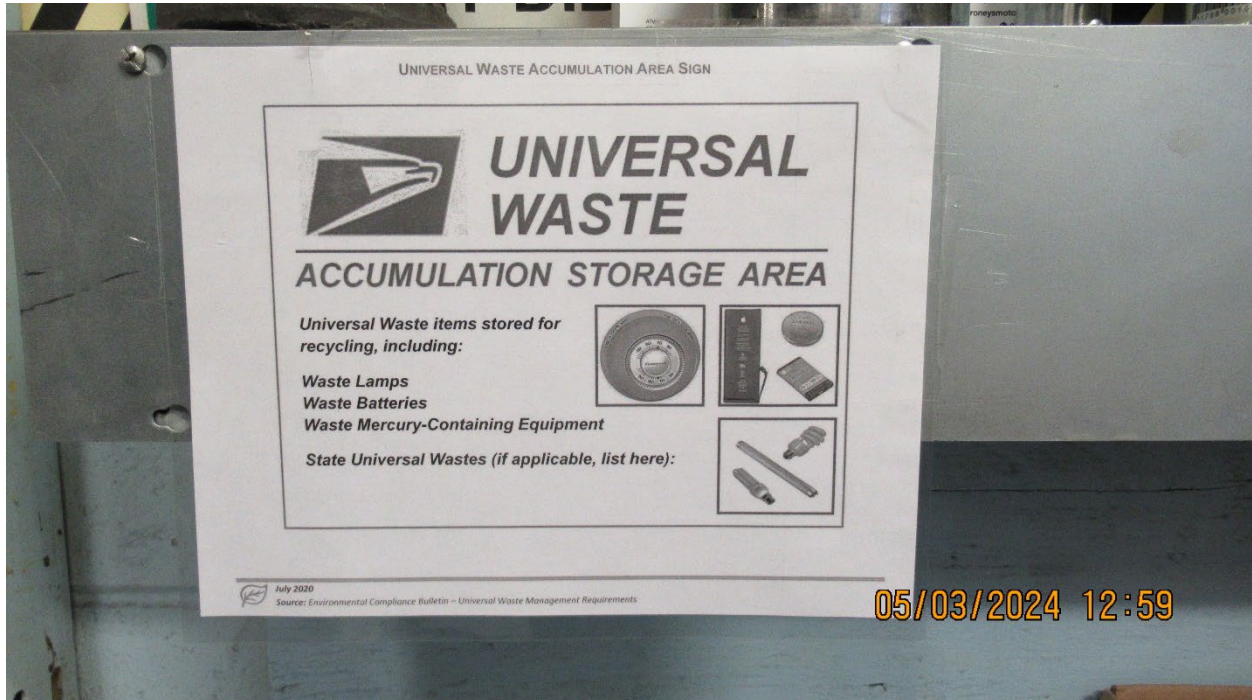


Photo 4



Photo 5



Photo 6



Photo 7



Photo 8



Photo 9

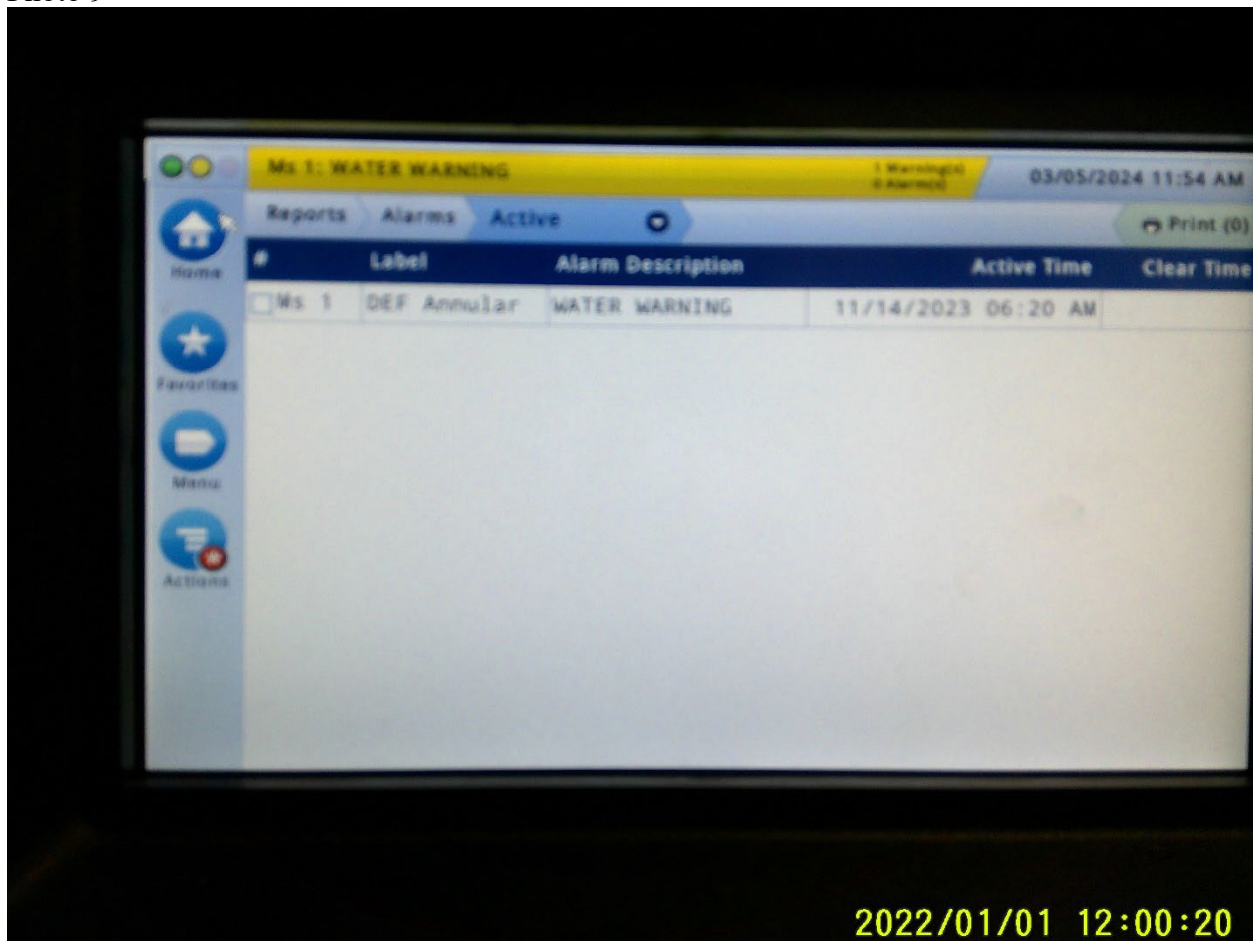


Photo 10



Photo 11



Photo 12



Photo 13

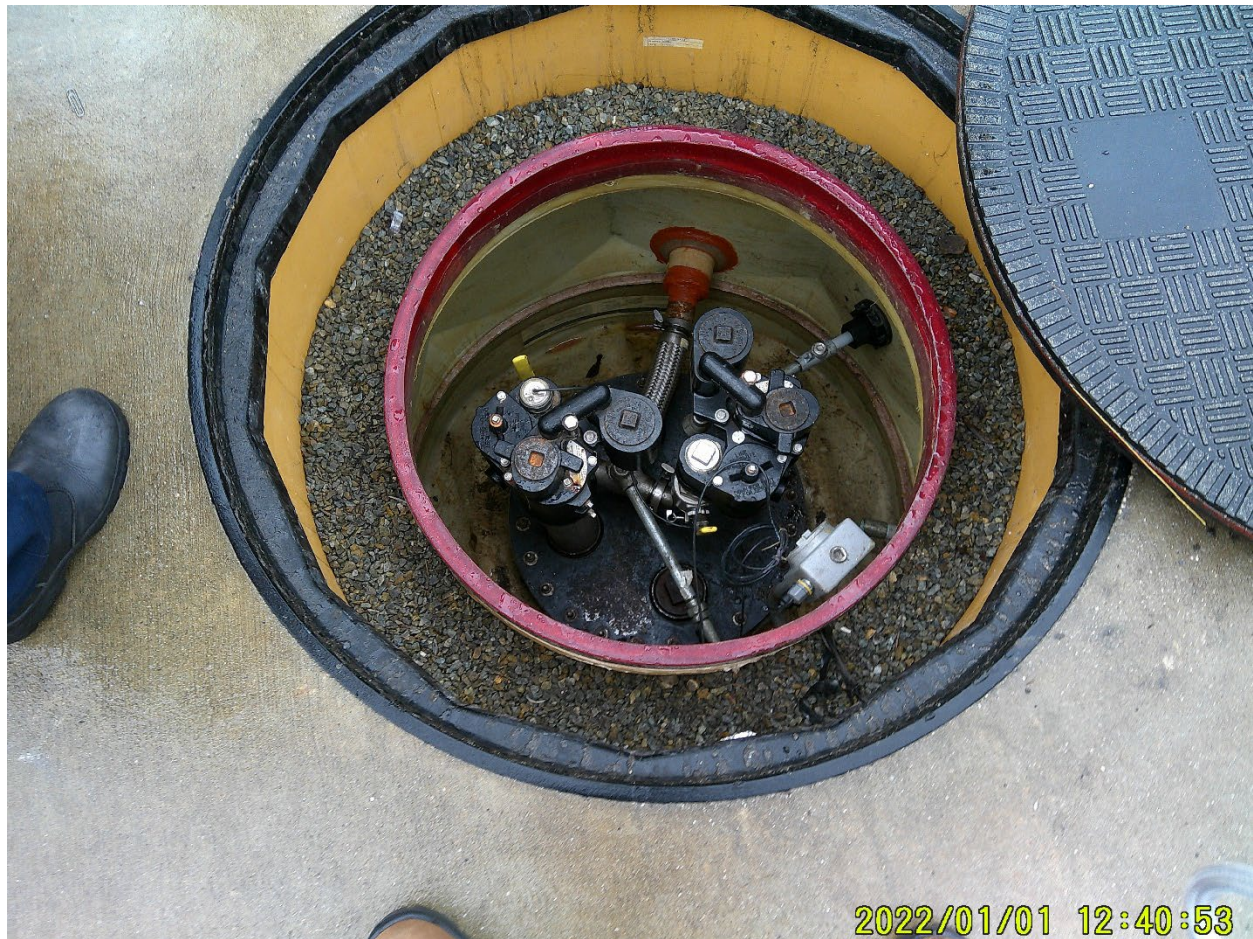


Photo 14



Photo 15



Photo 16

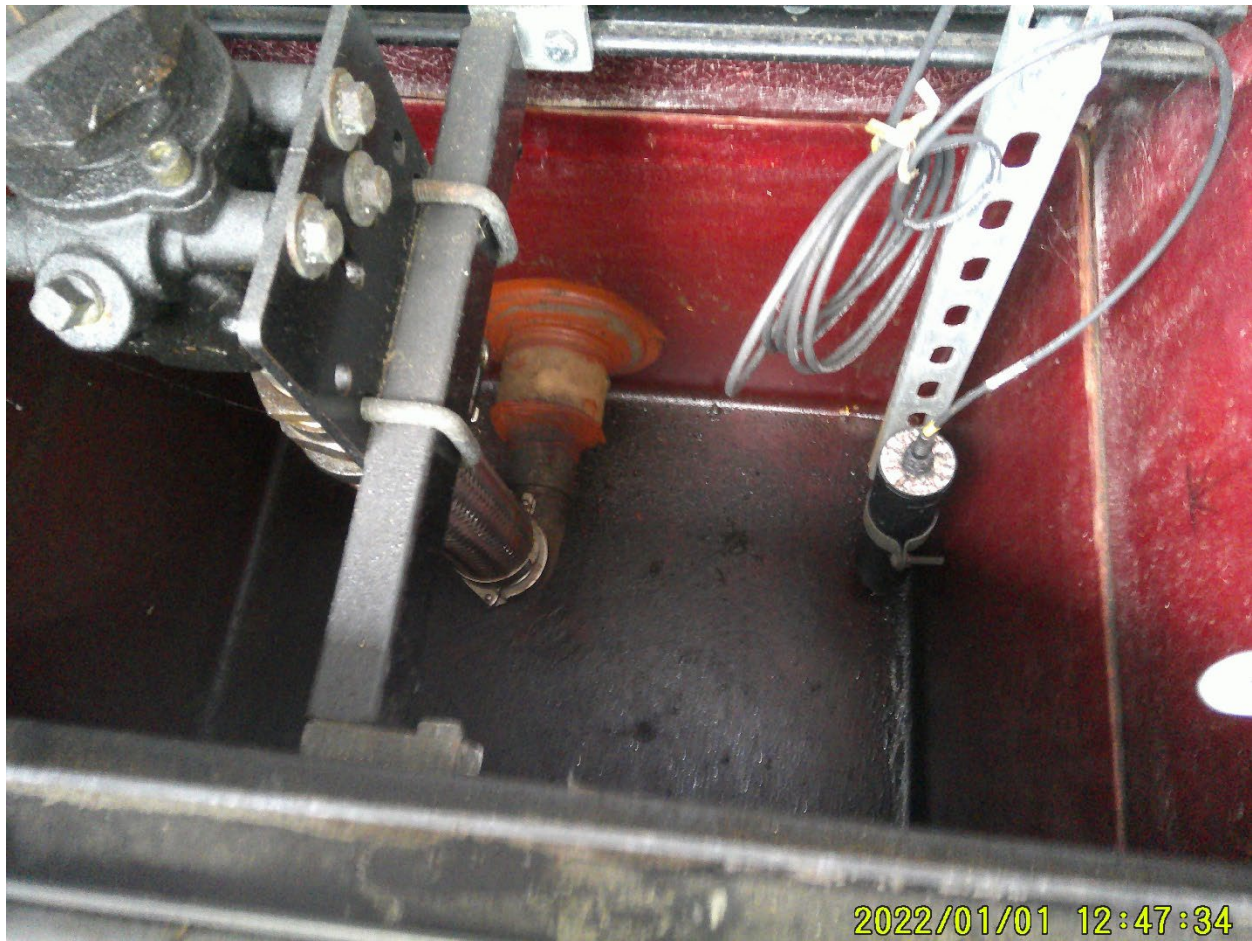


Photo 17

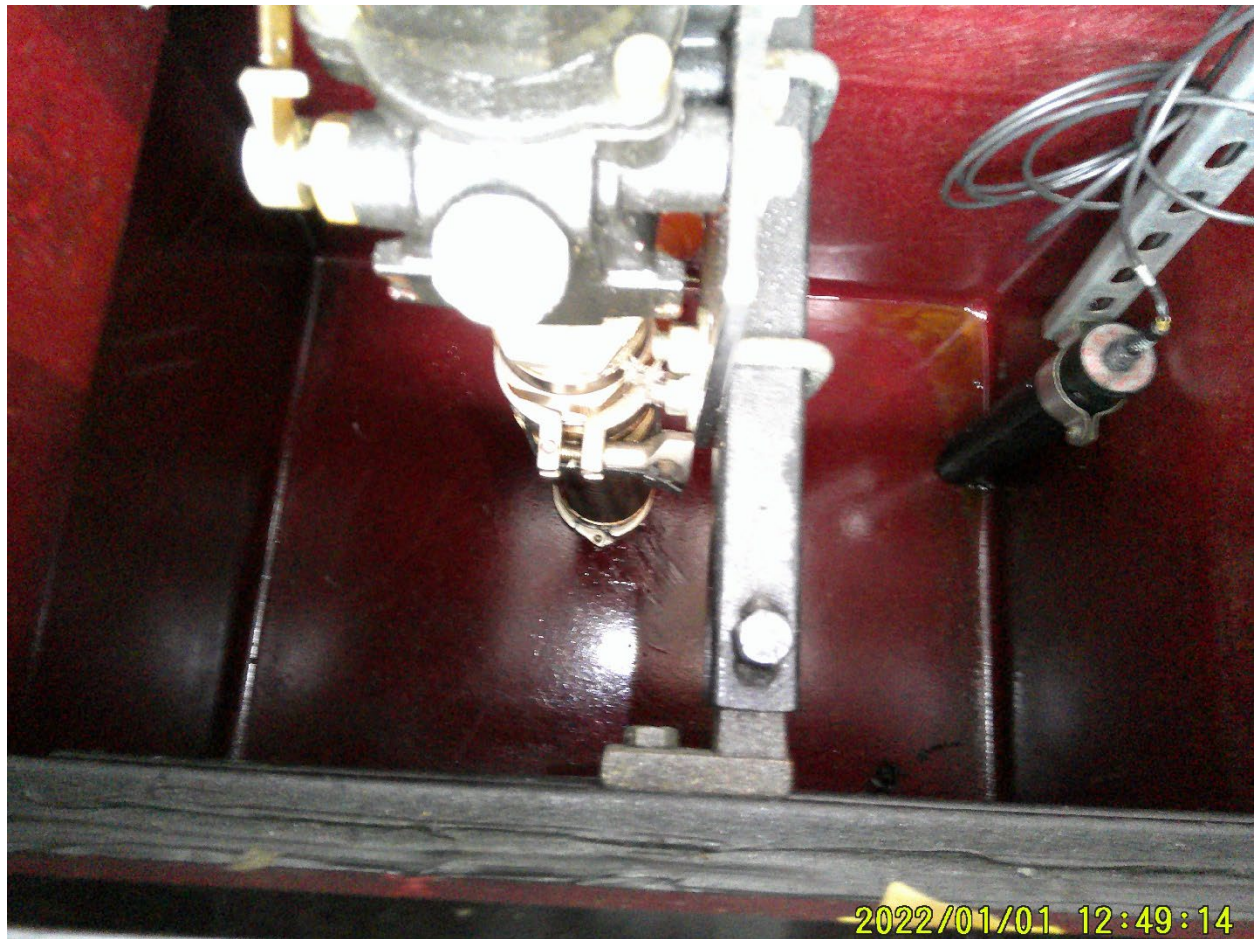
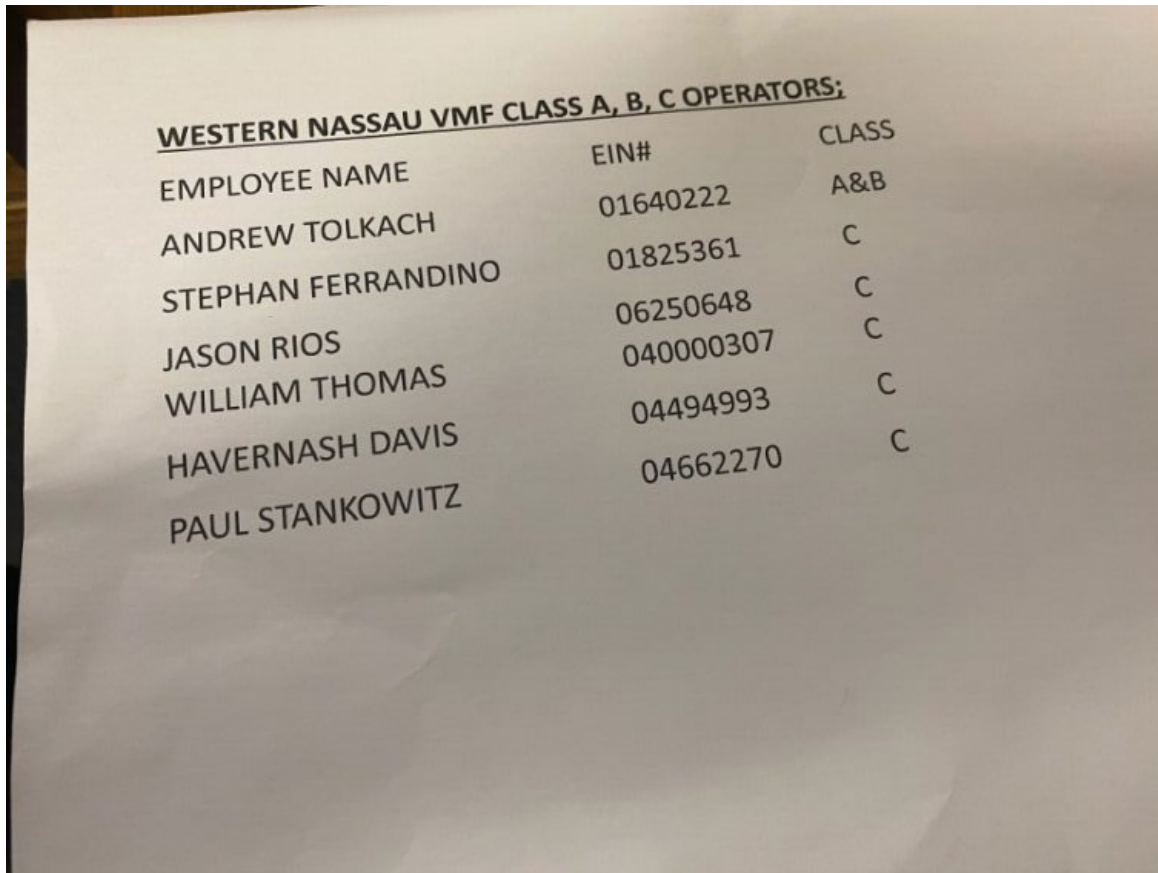
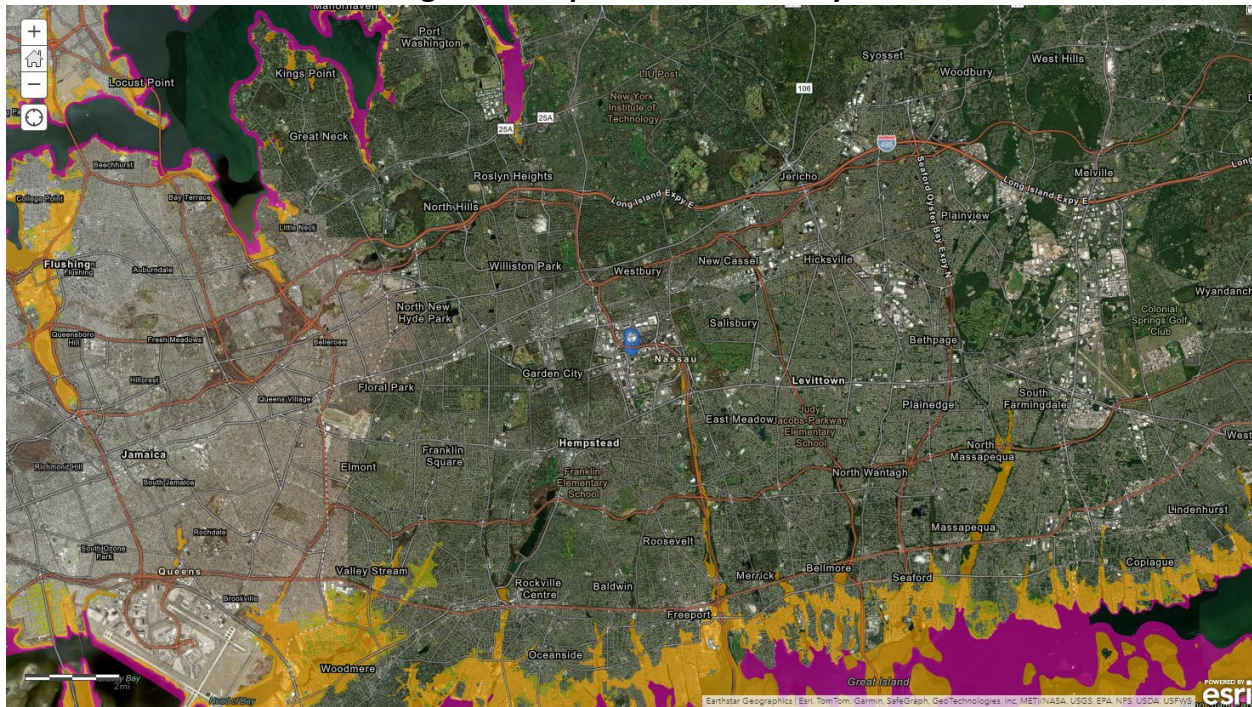


Photo 18

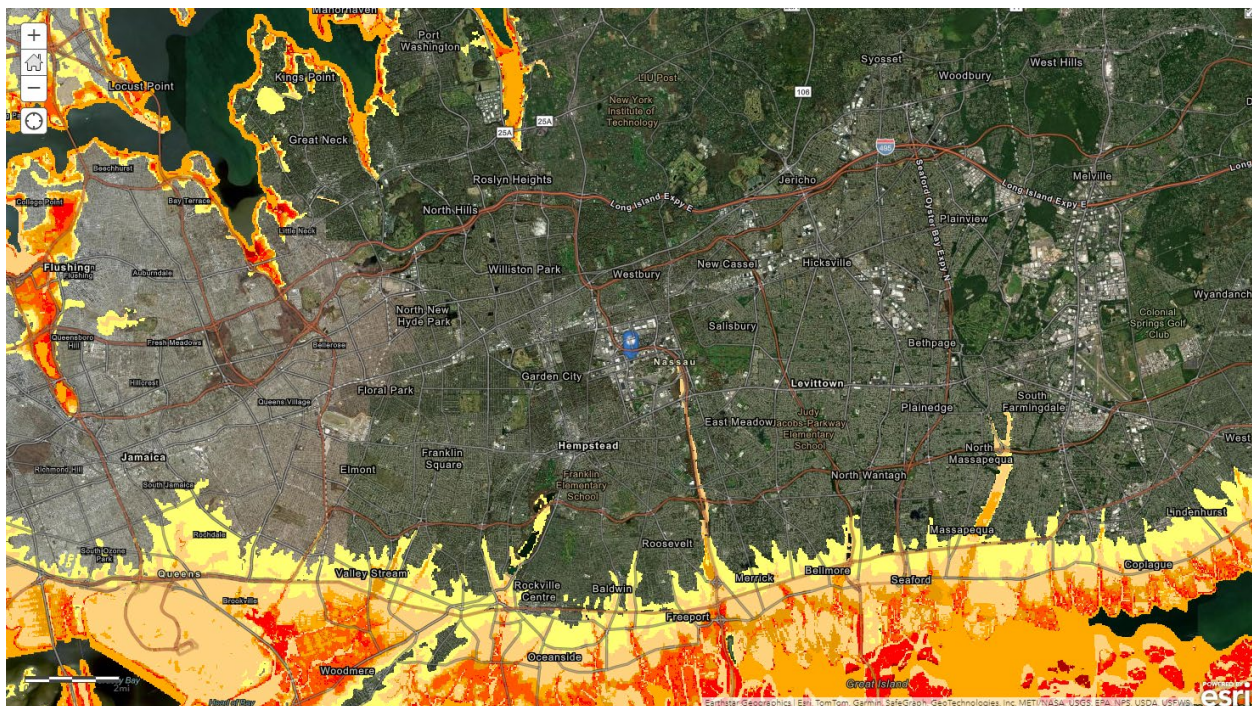


<u>WESTERN NASSAU VMF CLASS A, B, C OPERATORS;</u>		
EMPLOYEE NAME	EIN#	CLASS
ANDREW TOLKACH	01640222	A&B
STEPHAN FERRANDINO	01825361	C
JASON RIOS	06250648	C
WILLIAM THOMAS	040000307	C
HAVERNASH DAVIS	04494993	C
PAUL STANKOWITZ	04662270	C

Appendix B: Federal Emergency Management Agency (FEMA) 100 Year Flood Zone and EPA's Region 2 Composite Flood Risk Layer

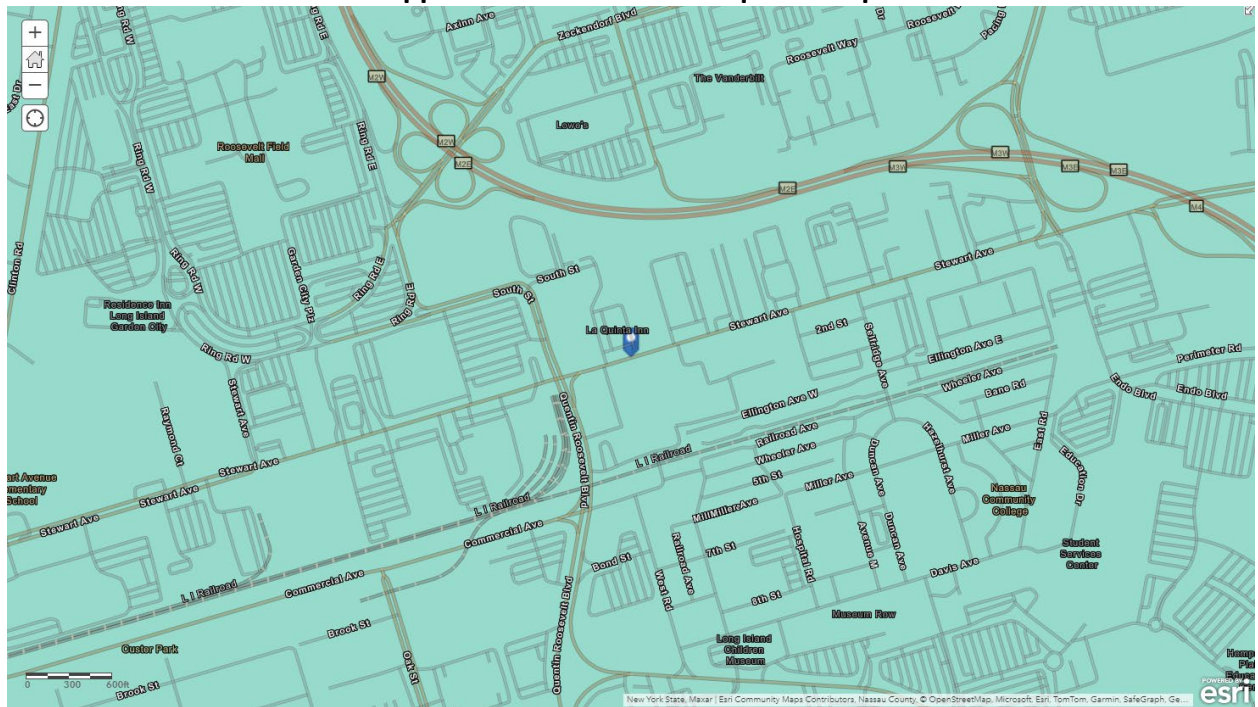


The facility is not located within a FEMA 100-year flood zone area.



The facility is not located within the EPA's Region 2 Composite Flood Risk potential risk area.

Appendix C: Sole Source Aquifer Map



The facility is located within a Sole Source Aquifer area.



EJScreen Community Report

This report provides environmental and socioeconomic information for user-defined areas, and combines that data into environmental justice and supplemental indexes.

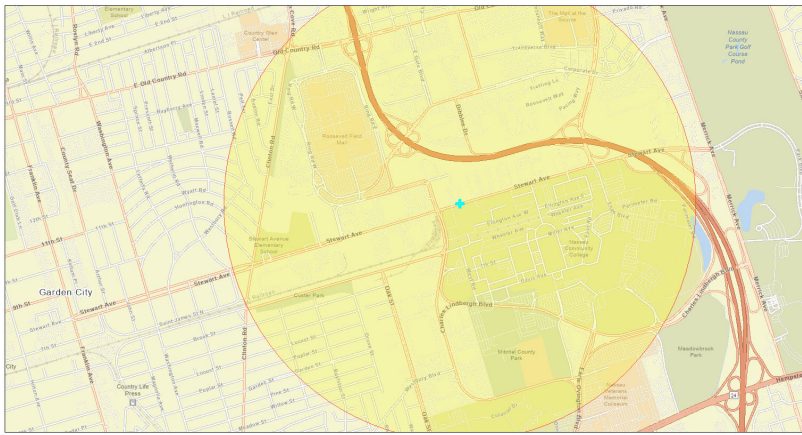
Uniondale, NY

1 mile Ring Centered at 40.733584,-73.603270

Population: 7,470

Area in square miles: 3.14

A3 Landscape

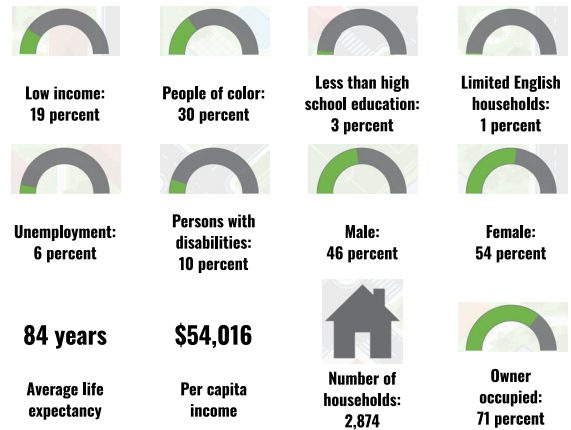


April 25, 2024
USPS West Nassau

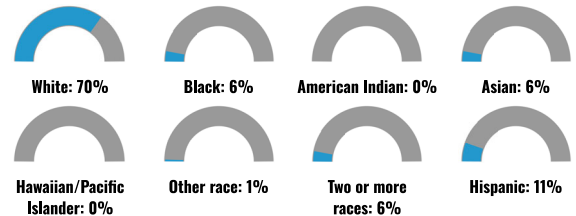
0 0.17 0.35 0.7 mi
0 0.28 0.55 1.1 km

Map: Community Maps, Contributors: Esri, TomTom, Garmin, SatNav, GeoHive, OpenStreetMap, US, ETOPO1, USGS, EPA, NPS, US Census Bureau, USDA, USFWS

COMMUNITY INFORMATION



BREAKDOWN BY RACE



BREAKDOWN BY AGE



LIMITED ENGLISH SPEAKING BREAKDOWN



LANGUAGES SPOKEN AT HOME

LANGUAGE	PERCENT
English	80%
Spanish	9%
French, Haitian, or Cajun	1%
Russian, Polish, or Other Slavic	2%
Other Indo-European	4%
Korean	1%
Chinese (including Mandarin, Cantonese)	2%
Other Asian and Pacific Island	1%
Other and Unspecified	1%
Total Non-English	20%

Notes: Numbers may not sum to totals due to rounding. Hispanic population can be of any race. Source: U.S. Census Bureau, American Community Survey (ACS) 2017-2021. Life expectancy data comes from the Centers for Disease Control.

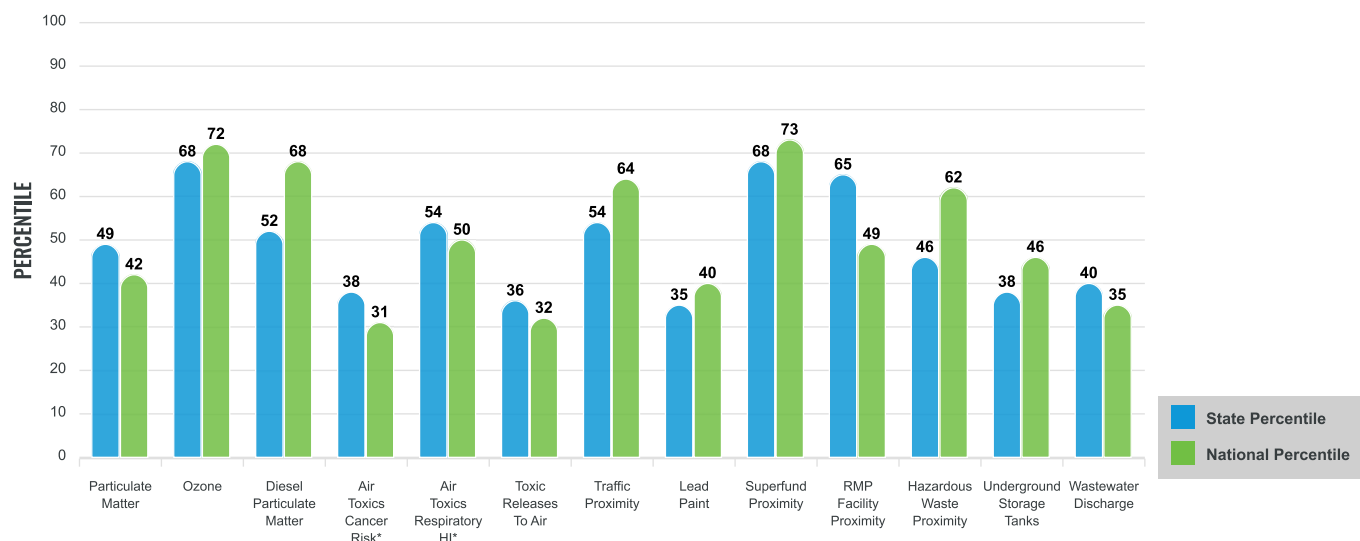
Environmental Justice & Supplemental Indexes

The environmental justice and supplemental indexes are a combination of environmental and socioeconomic information. There are thirteen EJ indexes and supplemental indexes in EJScreen reflecting the 13 environmental indicators. The indexes for a selected area are compared to those for all other locations in the state or nation. For more information and calculation details on the EJ and supplemental indexes, please visit the [EJScreen website](#).

EJ INDEXES

The EJ indexes help users screen for potential EJ concerns. To do this, the EJ index combines data on low income and people of color populations with a single environmental indicator.

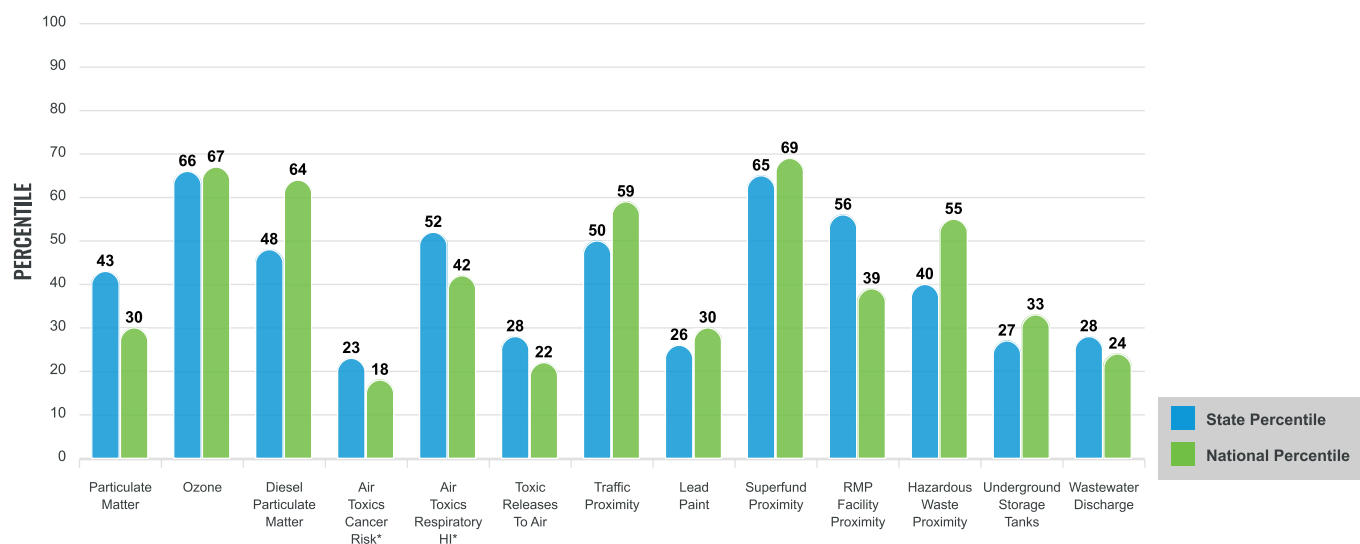
EJ INDEXES FOR THE SELECTED LOCATION



SUPPLEMENTAL INDEXES

The supplemental indexes offer a different perspective on community-level vulnerability. They combine data on percent low-income, percent linguistically isolated, percent less than high school education, percent unemployed, and low life expectancy with a single environmental indicator.

SUPPLEMENTAL INDEXES FOR THE SELECTED LOCATION



These percentiles provide perspective on how the selected block group or buffer area compares to the entire state or nation.

Report for 1 mile Ring Centered at 40.733584,-73.603270

EJSscreen Environmental and Socioeconomic Indicators Data

SELECTED VARIABLES	VALUE	STATE AVERAGE	PERCENTILE IN STATE	USA AVERAGE	PERCENTILE IN USA
POLLUTION AND SOURCES					
Particulate Matter ($\mu\text{g}/\text{m}^3$)	7.65	7.71	45	8.08	36
Ozone (ppb)	69.9	62.6	93	61.6	93
Diesel Particulate Matter ($\mu\text{g}/\text{m}^3$)	0.429	0.525	53	0.261	86
Air Toxics Cancer Risk* (lifetime risk per million)	20	25	5	25	5
Air Toxics Respiratory HI*	0.3	0.33	41	0.31	31
Toxic Releases to Air	120	450	27	4,600	25
Traffic Proximity (daily traffic count/distance to road)	410	430	71	210	88
Lead Paint (% Pre-1960 Housing)	0.34	0.55	26	0.3	61
Superfund Proximity (site count/km distance)	1.1	0.24	95	0.13	98
RMP Facility Proximity (facility count/km distance)	0.15	0.21	71	0.43	45
Hazardous Waste Proximity (facility count/km distance)	1.9	4.3	45	1.9	72
Underground Storage Tanks (count/km ²)	1	7.7	35	3.9	48
Wastewater Discharge (toxicity-weighted concentration/m distance)	7.4E-05	5	30	22	28
SOCIOECONOMIC INDICATORS					
Demographic Index	26%	35%	47	35%	45
Supplemental Demographic Index	9%	14%	30	14%	26
People of Color	30%	42%	48	39%	49
Low Income	19%	28%	41	31%	35
Unemployment Rate	6%	6%	61	6%	64
Limited English Speaking Households	1%	7%	48	5%	59
Less Than High School Education	3%	12%	22	12%	23
Under Age 5	5%	5%	55	6%	53
Over Age 64	27%	17%	85	17%	84
Low Life Expectancy	6%	17%	0	20%	0

*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>.

Sites reporting to EPA within defined area:

Superfund	1
Hazardous Waste, Treatment, Storage, and Disposal Facilities	0
Water Dischargers	11
Air Pollution	12
Brownfields	0
Toxic Release Inventory	4

Other community features within defined area:

Schools	4
Hospitals	0
Places of Worship	0

Other environmental data:

Air Non-attainment	Yes
Impaired Waters	No

Selected location contains American Indian Reservation Lands*	No
Selected location contains a "Justice40 (CEJST)" disadvantaged community	Yes
Selected location contains an EPA IRA disadvantaged community	Yes

Report for 1 mile Ring Centered at 40.733584,-73.603270

EJScreen Environmental and Socioeconomic Indicators Data

HEALTH INDICATORS					
INDICATOR	VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Low Life Expectancy	6%	17%	0	20%	0
Heart Disease	4.5	5.6	17	6.1	19
Asthma	9	10	24	10	22
Cancer	6	6	45	6.1	43
Persons with Disabilities	9.7%	11.8%	40	13.4%	30

CLIMATE INDICATORS					
INDICATOR	VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Flood Risk	10%	11%	65	12%	64
Wildfire Risk	0%	1%	0	14%	0

CRITICAL SERVICE GAPS					
INDICATOR	VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Broadband Internet	17%	13%	70	14%	66
Lack of Health Insurance	5%	5%	58	9%	35
Housing Burden	Yes	N/A	N/A	N/A	N/A
Transportation Access	Yes	N/A	N/A	N/A	N/A
Food Desert	No	N/A	N/A	N/A	N/A

Report for 1 mile Ring Centered at 40.733584,-73.603270