

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

Amazon.Com Services LLC – SNE1
3860 South 24th Street
Council Bluffs, Iowa 51501
800-575-0171

EPA ID Number: IAR000527465

On

October 21, 2024

By

TOEROEK ASSOCIATES, INC.

For

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

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, Toeroek Associates, Inc., and its subcontractor CLAENE Group (Toeroek team) attempted to conduct a hazardous waste compliance evaluation inspection (CEI) at the Amazon.Com Services LLC - SNE1 (Amazon) located at 3860 South 24th Street in Council Bluffs, Iowa. The CEI was initiated under the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended. The CEI covered hazardous waste generator requirements, used oil management, and universal waste requirements, as applicable. This report and its attachments present the results of the CEI.

PARTICIPANTS

Kroll Construction:

Ryan Kuka, Project Engineer, (845) 522-9982, ryan@krollconstruction.com
Brad Hardt, Safety/Compliance Manager, (928) 965-2370, brad@krollcontruction.com

Toeroek Team:

Steve A. Johnson, Inspector, 816-520-7009

INSPECTION PROCEDURES

Prior to initiating the CEI at Amazon, I conducted a drive-by visual inspection of the site and contiguous properties. I did not observe any areas of concern during the perimeter survey. Upon my arrival at the main entrance to the facility, I noted that the employee entrance gate was closed and locked. I approached the security checkpoint at the main truck gate and found the security post unoccupied. I observed several noncommercial vehicles parked in an area approximately 200 feet from the northeast corner of the building. I proceeded to drive around the building inside the exterior fence along the west and south sides of the facility. Photographs taken during the perimeter and onsite surveys are included in Attachment 1, Photographs 1 through 6. A Google Earth aerial photograph of the facility was downloaded after the site visit and is included as Attachment 2.

I made contact with two workers who were loading cardboard and wooden pallets into separate roll-off containers on the south side of the facility. The workers advised that they were temporary employees under the supervision of the on-site construction contractor. They directed me to the contractor's entrance on the southeast corner of the building. Upon entering the building, I spoke with several construction employees who stated that the building had just undergone "tear-out" of most of the material handling equipment and that the renovation project was nearing completion.

I also spoke with Mr. Hardt, who explained that no Amazon personnel were present at the facility. He also stated that no production-related hazardous wastes had been removed from the site prior to start-up of the renovation project. Mr. Hardt reported that a few empty paint containers were generated from painting aisle markings and column bollards. He escorted me to the small storage crib where I observed nine gallons of enamel floor paint in various colors. Mr. Hardt also reported that renovation activities generated a few empty aerosol cans used for stencil paint and adhesive applications. According to Mr. Hardt, empty paint cans and empty aerosol containers are disposed as general trash, which is collected for landfill disposal.

Upon conclusion of the visual inspection, I spoke with Mr. Kuka in the contractor's onsite administrative trailer. Mr. Kuka provided a brief oversight of the scope and timeline of the renovation project. He stated that the facility effectively closed to routine operations in late February 2024 for renovation. The renovation project was intended to increase total inventory capacity and improve efficiency of material handling through upgrades in automation. According to Mr. Kuka, most of the structural renovations had been completed. The contractors were reportedly waiting for process control equipment and automation integrators to proceed with completion of the full installation. Mr. Kuka estimated that the renovation project was approximately 80% complete. According to Messrs. Kuka and Hardt, Amazon is expected to relaunch normal operations in late November 2024.

I asked about the disposition of solid wastes generated from the project. Mr. Hardt explained that recyclable wastes, such as wooden pallets and shipping containers, cardboard, and scrap metal, are collected separately from general trash for recycling at a nearby recovery facility. During the site visit, I observed dedicated roll-off containers for collection of wood scrap, cardboard, and scrap metal.

RCRA STATUS

Amazon was not in operation at the time of the CEI and no hazardous wastes were observed in accumulation. I changed the hazardous waste generator status for the facility to non-generator on the Notification Acknowledgement/Verification Report provided by EPA prior to the inspection (Attachment 3).

SUMMARY OF PRELIMINARY FINDINGS

Amazon was not in operation at the time of the CEI. I made no preliminary findings; however, further review by EPA may change or add to my findings.

Steve A.
Johnson

Digitally signed by Steve
A. Johnson
Date: 2024.12.18
09:31:02 -06'00'

Steve A. Johnson, Inspector
CLAENE Group

AMBER WHISNANT

Digitally signed by
AMBER WHISNANT
Date: 2024.12.20
08:36:59 -06'00'

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

Attachments:

1. Photographic Documentation (Photolog and 6 Photographs) (4 pages)
2. Google Earth Aerial Photograph (1 page)
3. Notification Acknowledgement/Verification Report (2 pages)