



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

EPA Representative: Alex Rosenberg

Digitally signed
by ALEX
ROSENBERG
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A handwritten signature in black ink, appearing to read "Alex Rosenberg", is positioned to the left of the digital signature text.

I. Facility Information

- A. Facility Name:* United States Postal Service (USPS) Chelsea Vehicle Maintenance Facility (VMF) (Facility)
- B. Facility Location:* 307 Beacham Street
Chelsea, MA 02150
Latitude/Longitude: 42.394496°N, 71.051802°W
- C. Facility Contact/s:* Fred Scheu, VMF Manager (Not present for the inspection)
617-348-2118
Damion Sampath Sr., Framingham VMF Manager
William Grimes, Mechanic
- D. ID No(s):* National Pollutant Discharge Elimination System
(NPDES ID) MAR053709
Facility Registry Service ID 110067019988

II. Background Information

- A. Date of inspection:* November 15, 2022
- B. Weather Conditions:* Cloudy, 45°F
- C. US EPA Inspector(s):* Michael Prescott, EPA Contract Inspector
Alex Rosenberg, Inspector, EPA Region 1
Shannon Shea, Inspector, EPA Region 1

D. State/Local Representative(s): None

E. 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 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 and the MSGP.

IV. Disclaimer:

Unless otherwise noted, this report describes conditions at the Facility/property as observed by 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 information¹ the Facility is identified in a Flood Hazard Zone. The Facility, based on its location, has reasonable potential to discharge stormwater, oils, and chemicals to surface waters directly and/or indirectly. Surface flow runoff from the Facility yard enters the Massachusetts Water Resources Authority (MWRA) Municipal Separate Stormwater Sewer System (MS4) which drains/discharges into the Mystic River.

According to EPA's records, on May 14, 2021, the Facility submitted into EPA's electronic NPDES system a Notice of Intent to be covered under the Multi-Sector General Permit (MSGP) for Stormwater Discharges Associated with Industrial Activity. The Facility reported on the form a primary standard industrial classification code (SIC) of 4311, United States Postal Service. The Facility provided key information from their Stormwater Pollution Prevention Plan (SWPPP) in the NOI. The Facility had also been covered under the previous MSGP based on an earlier submittal of an NOI on 10/20/15.

¹ <https://msc.fema.gov/portal/home>

The Facility also submitted into EPA's electronic NPDES DMR system quarterly stormwater and annual impaired waters monitoring reports and annual MSGP compliance reports (i.e., Annual Reports). The indicator pollutant monitoring for the third and fourth quarters for 2021 show monitoring had been conducted for pH, Total Suspended Solids (TSS), and Chemical Oxygen Demand (COD). The annual impaired waters monitoring reports for 2019 and 2020 was reviewed and shows monitoring had been conducted for TSS, Nitrogen, and Coliforms.

The Annual Reports for 2019, 2020, and 2021 submitted by the Facility were reviewed. The Annual Report for 2019 reported that the quarterly Facility inspection and visual assessment for the fourth quarter were missing due to the shutdown on September 2019 and that the quarterly inspections and assessments should resume in the new year. The Annual Reports for 2020 and 2021 reported that all quarterly Facility inspections and visual assessments were conducted (although the dates for the four inspections in 2021 did not align with the prescribed date ranges for each respective quarter. No issues were noted.

The 2020 Annual Report mentioned that during the comprehensive site assessment, the aboveground storage tanks (ASTs) appeared to be significantly rusted and continued deterioration of the ASTs pose a stormwater risk for the facility if they failed. The 2021 Annual Report did not mention this issue and if/how it was corrected.

VI. In-Briefing and Document Reviews

The inspectors arrived at the site at 12:15 p.m. and were greeted by Mr. Sampath and Mr. Grimes (Facility representatives). The primary Facility representative, Fred Scheu, was not available on the day of the inspection. The inspectors presented credentials and requested permission to enter the Facility and conduct the site inspection. Facility representatives agreed. The inspectors discussed the purpose and scope of the inspection including 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. Rosenberg explained to Facility representatives the federal industrial stormwater program, and specifically the requirements of Sector P (Land Transportation and Warehousing, Part 8 of the 2021-MSGP). Mr. Rosenberg explained Sector P facilities are required to, among other things, collect and analyze industrial stormwaters discharged from property outfall(s) for certain indicator pollutants of concern identified in Part 8.P.6 of the 2021-MSGP.

The Facility representatives informed the inspectors the Facility is a federal government vehicle maintenance facility (VMF) for USPS vehicles, but it has not been in operation since September 2019. The Facility was shut down due to corrosion of its sanitary sewer pipes and the pumps that connect the sanitary sewer discharges from the VMF building to the main sanitary sewer (see Photo 2 for a view of the excavation in the floor of the building and the exposed sanitary sewer pipes). According to the Facility representatives, there have been past attempts to correct this problem and install a direct connection to the main sanitary sewer, but nothing was ever completed. The Facility recently obtained funding to complete the work, but there is still no

known timetable to complete the work and startup the Facility again (per the Facility representatives). During this shutdown, the Facility representatives reported no vehicle maintenance has been conducted at this Facility and all vehicle maintenance is being done at the Boston location.

Even though no vehicle maintenance activities are being conducted on site currently, the Facility continues to comply with the MSGP including conducting quarterly inspections of the Facility, quarterly visual assessments of samples from the primary outfall, quarterly indicator pollutant monitoring of samples from the primary outfall, and preparation of Annual Reports. The inspectors reviewed the quarterly facility inspections checklists required by the MSGP back to 2021 and they were mostly complete, except for an incorrect date and an incomplete back page of the template form used by the Facility.

Mr. Grimes does the sampling for visual assessments of stormwater samples from the stormwater drain in front of the VMF and documents the observations. The inspectors reviewed the quarterly visual assessments of stormwater samples required by the MSGP back to early 2021 and they were mostly complete. The Facility was unable to conduct assessments in some quarters due to lack of stormwater events.

Part 3.2.2.1. of the permit requires visual assessments to be made from a colorless glass or plastic container. Mr. Grimes collects water for visual assessment using a long plastic tube that is somewhat opaque. The inspectors recommended he pour the stormwater samples from the tube into a clear container to make his visual observations.

Facility representatives reported that a contractor, ATC Group Services, did the quarterly indicator monitor sampling and Con-Test laboratories performed the analyses. The analysis have been electronically submitted to EPA along with annual impaired waters monitoring results.

The inspectors reviewed the SWPPP dated May 2021 and noted the following discrepancies:

- The certifications were not signed by the Manager of Fleet Operations nor the Facility Manager on the two certification pages.
- Table 1 identifies the heating oil AST as having 1000 gallons of capacity, but elsewhere the capacity is shown as 2000 gallons.
- Table 3 containing emergency contacts is not up to date.

After the inspection, on 11/23/22, Mr. Scheu emailed the inspectors scans of the signed certifications from the hard copy of the SWPPP that had been stored at the Boston office. Signatures were dated 5/13/21 and 5/14/21.

The inspectors informed Facility representatives 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

The Facility representatives escorted the inspectors throughout the Facility yard and VMF building which they believe was built around 1978. 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 noted no vehicle maintenance was being conducted.

The inspectors observed five 55-gallon drums in overpack containers on the second floor above the main garage bay that the Facility representatives reported contained automobile fluids. Also in the main maintenance bay was a 330-gallon aboveground storage tank (AST) that contained new oil (see Photo 1). The AST appeared to be single-walled and review of the Spill Prevention Control and Countermeasure (SPCC) Plan dated September 2020 did not indicate it was double-walled.

According to Facility representatives, the floor drains in the building flow to an oil water separator (OWS) outside the building that was last pumped out in February 2018. The SPCC Plan identified the OWS as having a capacity of 2000 gallons, but the SWPPP indicated it had a capacity of 500 gallons.

The inspectors walked around the outside of the building, through the parking areas, and the perimeter of the paved areas looking for potential exposure of pollutants to stormwater and any signs of contamination. The inspectors observed a trench drain in front of the building (see Photo 3) that Facility representatives reported was connected to the storm sewer. In addition, the inspectors observed the old fuel island with no fuel dispensers. According to Facility representatives, the fuel dispensers and USTs had been removed about 20 years ago.

In the back of the building were three ASTs that still contained oils and antifreeze: one 2000-gallon heating oil AST, one 500-gallon used oil AST, and one 500-gallon used antifreeze AST (see Photos 4, 5, 6, and 7 for views of these ASTs). The paint on these three ASTs was peeling and there was rust on all three tanks. Facility representatives reported there had been no spills or releases of hazardous materials/oils in the past three years. The aboveground piping connecting the ASTs to access points inside the building appeared to be in good condition with very little rust (see Photo 7). Also near these ASTs was a HAZMAT metal shed used for hazardous waste containers. The shed was empty (see Photos 4 and 5). The corrosion of the outside of the ASTs and HAZMAT building was attributed by the Facility representatives to the saltwater mist in the air from the nearby ocean bay.

Two stormwater catch basins collect runoff from paved surfaces, one on either side of the building (see Photos 8 and 9). According to Facility representatives and corroborated by the maps in the SWPPP on-site, the drain located approximately 10 yards away from the ASTs is connected to the main storm sewer and eventually connects to the stormwater drain in the parking area on the other side of the building. There were signs of an oil sheen in the drain near the ASTs (see Photo 8), but not in the other stormwater drain.

There were no signs of fluid leaks from in service fleet vehicles.

Many rubber bands were observed on the pavement around the building and near the storm drains (see Photo 10 - litter near storm drain). EPA inspectors recommended the rubber bands be cleaned up.

The inspectors did not see a sign posting the permit required MSGP information (see Part 1.3.5.) at the entrance or anywhere on the Facility.

VIII. Closing Conference

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

- The Facility has three ASTs that contained heating oil, used oil, and used antifreeze outside the building and near a stormwater drain that were observed to have peeling paint and rust. The peeling paint and rust have been identified by Facility representatives as areas needing corrective actions during past inspections.
- There was no sign for posting MSGP information at the entrance as required by the permit.
- The SWPPP dated May 2021 had the following discrepancies:
 - Table 1 identifies the heating oil AST as having 1000 gallons of capacity, but elsewhere the capacity is shown as 2000 gallons.
 - Table 3 containing emergency contacts is not up to date.
- Facility representatives are continuing to perform the quarterly visual assessments of outfall stormwater samples, however the long plastic tube used to draw the samples is somewhat opaque making it difficult to clearly make observations of the samples. The inspectors recommended pouring samples from the tube into a clear glass container to make the observations. The EPA Guidance Manual "Industrial Stormwater Monitoring and Sampling Guide"², April 2021, is a very good reference for conducting stormwater monitoring (see section 3.E).

The inspectors exited the Facility at about 3:00 p.m.

ATTACHMENTS:

Attachment A – Photograph Log

² https://www.epa.gov/sites/default/files/2015-11/documents/msgp_monitoring_guide.pdf