



ENVIRONMENTAL PROTECTION AGENCY
REGION 1 – NEW ENGLAND
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

September 9, 2022

Ms. Katherine Cinibulk, Regional Environmental Manager
Amazon.com Services, LLC (BDL2)
200 Old Iron Ore Road
Windsor, CT 06095

Re: U.S. EPA-Region 1 Inspection Report of Amazon.com Services, LLC
(BDL2), July 26, 2022

Dear Ms. Cinibulk:

In accordance with current policy, I am providing you with a copy of the final inspection report summarizing observations made during the July 26, 2022, inspection of your facility. Documents provided by the facility noted in Attachment 1 have not been included, as these documents are already in the facility's possession.

This inspection was conducted under the authority of RCRA.

Please contact me at 617-918-1678 or Carew.James@epa.gov if you have any questions.

Sincerely,

James Carew, Life Scientist
Waste and Chemical Compliance Section

cc: Joseph Schiavone, CT DEEP

Disclaimer: Unless otherwise noted, this report describes conditions at the facility/property as observed by EPA inspector(s), and/or through records provided to and/or information reported to EPA inspector(s) by facility representatives and as understood by the inspector(s). This report may not capture all operations or activities ongoing 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.

RCRA HAZARDOUS WASTE INSPECTION REPORT

I. GENERAL INFORMATION

- a. **Facility Name:** Amazon.com Services, LLC (BDL2)
- b. **Inspection Date:** July 26, 2022
- c. **Inspection Type:** RCRA Compliance Evaluation Inspection (CEI)
- d. **EPA Inspectors:** James Carew, Life Scientist
Drew Meyer, Environmental Scientist
- e. **EPA ID Number:** CTR000514208
- f. **NAICS:** 49311 – General Warehousing and Storage
- g. **Street Address:** 200 Old Iron Ore Road, Windsor, CT 06095
- h. **Mailing Address:** PO Box 80842, Seattle, Washington, 98108-0000
- i. **Facility Contacts:** Katherine Cinibulk
Regional Environmental Manager
Phone: 615-202-5008
Email: cinibuk@amazon.com
- j. **Generator Status (per RCRAInfo):** Large Quantity Generator (LQG)
- k. **Date first notified as a generator (per RCRAInfo):** March 9, 2015 (SQG)
- l. **Date of most recent notification in RCRAInfo:** February 14, 2022 (LQG)
- m. **Current Property Owner:** KTR CT I LLC
- n. **Current Operator:** Amazon.com Services, LLC
- o. **Wastes generated (per most recent RCRAInfo notification):**
D001, D002, D003, D004, D005, D006, D007, D008, D009, D010, D011, D016,
D018, D027, D035, F002, U002, U154, U159, U249

Report Attachments:

Attachment 1 – Digital photo log of photos taken by EPA inspectors

II. FACILITY DESCRIPTION

Amazon.com Services, LLC (BDL2) (Amazon or “facility”) is a large warehouse and fulfillment center for an online retailer. The facility receives inbound shipments from vendors and sends outbound shipments to customers. Initial notification as a Small Quantity Generator (SQG) was made on March 9, 2015. The facility notified as a Large Quantity Generator (LQG) on December 17, 2019, and has since re-notified as a LQG on February 14, 2022. Waste generated at the facility is primarily consumer goods damaged during shipment.

The facility began operations at the site in 2015. Based on an estimate using ArcGIS Earth, the footprint of the building is approximately 1 million square feet located in a mixed-use area with various office buildings, retail outlets and baseball fields in close proximity.

III. INSPECTION IN-BRIEF

EPA inspectors arrived at the Facility at 200 Old Iron Ore Road, Windsor, CT at 8:45 AM on July 26, 2022. The EPA Region 1 inspection team (“inspection team”) consisted of James Carew and Drew Meyer. The inspection team was greeted at the Facility by Tyra Declaire and Robbie Moring and escorted to a conference room in the facility. The inspection team presented their EPA credentials and provided business cards to the Amazon staff at this time.

Inspector Carew provided facility personnel with a copy of EPA’s Proprietary/Confidential Business Information (CBI) Notice, and CBI Notice Questions & Answers document.

The following personnel were present at the in-brief:

EPA:	James Carew, Life Scientist Drew Meyer, Environmental Scientist
Amazon:	Tyra Declaire, Warehouse Health & Safety Specialist Robbie Moring, Injury Prevention

Ms. Declaire described the facility as a fulfillment center, servicing the local area. Shipments are received (inbound) from vendors at one side of the facility and shipped out (outbound) to customers from the other side of the facility. The facility began operations at this site in 2015 and currently has approximately 3,200 employees work varying shifts. Operations continue 24 hours a day, 7 days a week.

Ms. Declaire stated that the facility manages one Hazardous Waste Accumulation Area (HWAA) and two Satellite Accumulation Areas (SAA)¹. The facility is reported to not have any hazardous waste tanks, nor treat hazardous waste. The facility operates battery-powered equipment and recharges batteries on-site via battery charging stations.

¹ During the final out-brief, the Regional Environmental Manager clarified there are no SAAs at the facility.

Ms. Declaire described how hazardous waste is generated and how hazardous waste determinations are made at the facility:

- Warehouse associates discover damaged goods, move to “Products Awaiting Determination Area” PADA
- Waste Coordinators (WC) notified
 - WCs always on site, and usually on the “floor” or in Waste Cage area
- WC use an electronic waste tracker program to gather product information, and determine if it a hazardous waste
- WC moves wastes to the HWAA (“Waste Cage”)

As reported by the facility representatives, WCs receive emergency response training in spill response. Inspections of hazardous waste occurs weekly, monthly and annually. No reportable spills have occurred in the last several years, however there was a fire involving a passenger car in the parking lot, estimated to have been 2-3 years ago.

Meghan Flynn, Health and Safety Manager, joined the meeting and provided further details. Ms. Flynn stated the local Fire Marshal had visited the site following an expansion of the facility.

EPA Inspector Carew provided facility representatives with a list of documents routinely requested during RCRA inspections. Inspector Carew followed up by sending an email with a link to a secure EPA OneDrive folder and requested facility representatives submit the pertinent documents by adding them to the OneDrive folder. Inspector Carew provided a link to the folder via email on July 28, 2022, and requested the following documents:

- RCRA Inspection Schedule and Logs for the months: May 2020; February 2021; May 2022 specified
- Hazardous Waste Contingency Plan and documentation of transmittal to local authorities
- Records of Spills and/or implementation of the Contingency Plan
- RCRA Personnel Training Records
 - RCRA Training Program Description or Plan
 - Job Titles and Job descriptions for all positions with hazardous waste responsibilities
 - Names and job titles of all staff with hazardous waste responsibilities
 - Dates of employment for personnel with hazardous waste responsibilities
 - Documentation of annual training for the most recent three years
 - Documentation of DOT training for manifest signers
- Complete Hazardous Waste Manifests and Land Disposal Restriction Notices for all of 2021
- Exception Reports for Hazardous Waste Shipments for 2020-2022 (if applicable)
- Hazardous Waste Import/Export Records (if applicable)
- Any Clean Air Act (CAA) or Clean Water Act (CWA) permits maintained by the facility (if applicable)

IV. FACILITY TOUR

This section consists of observations by EPA Inspectors during the physical tour of the Facility. Please see Attachment 2 for a digital photo log of photos taken during the inspection.

The tour of the Facility began at approximately 10:10am on July 26, 2022. The following personnel were present for all or part of the tour:

EPA: James Carew
Drew Meyer

Amazon: Meghan Flynn
Tyra Declaire
Robbie Morong

Hazardous Waste Accumulation Area (HWAA) – “Waste Cage”

Amazon maintains one HWAA, referred to as the “Waste Cage”. This HWAA is surrounded on four sides by a vinyl coated, black, 8-foot, chain link fence. There were 22 waste containers inside the Waste Cage:

- 55-Gallon Drums x 18
 - 15 Hazardous Waste
 - 3 Non-Hazardous Waste
- 5-Gallon Buckets x 4
 - 4 Hazardous Waste

Inventory of wastes observed in the “Waste Cage”					
Container #	Waste Stream	HWD (Y/N)	EPA/State Waste Code	Location	Comments
1	UN2014 Waste Hydrogen Peroxide	Y	D001, D002	HWSA “Waste Cage”	
2	UN2468 Waste Trichloroisocyanuric Acid, Dry	Y	EPA Waste No. listed as “UN2468” on Hazardous Waste label	HWSA “Waste Cage”	D001 listed in Proper Shipping Name section of Hazardous Waste label.
3	UN3082 Waste Environmentally Hazardous Substances, Liquid NOS (Cyclohexanone, Biferthin)	Y	Not RCRA regulated (Herbicides/Fertilizers)	HWSA “Waste Cage”	
4	UN3266 Waste Corrosive Liquid (Sodium Hydroxide, Potassium Hydroxide)	Y	D002	HWSA “Waste Cage”	
5	UN1942 Waste oxidizing solid, NOS	Y	EPA Waste No. listed as “UN1942” on Hazardous Waste label	HWSA “Waste Cage”	UN1942 listed as “EPA Waste No.” & UN1479 listed as Proper Shipping Name. D001 listed in Proper Shipping Name section of Hazardous Waste label.

6	UN1790 Waste Hydrofluoric Acid	Y	EPA Waste No. listed as "UN1790" on Hazardous Waste label	HWSA "Waste Cage"	D002 listed in Proper Shipping Name section of Hazardous Waste label.
7	UN1950 Aerosols, Salvage	Y	Not RCRA regulated (Non-Flammable Aerosols)	HWSA "Waste Cage"	
8	NA3077 Hazardous Waste Solid NOS (Mercury)	Y	EPA Waste No. listed as "NA3077" on Hazardous Waste label	HWSA "Waste Cage"	D009 listed in Proper Shipping Name section of Hazardous Waste label.
9	UN3082 Waste Environmentally Hazardous Substances, Liquid NOS (Chromium, Selenium, Silver)	Y	D007, D010, D011	HWSA "Waste Cage"	
10	Biohazard Drum (empty)	N/A	N/A	HWSA "Waste Cage"	
11	UN2811 Waste, Toxic, Solids, Organic NOS		EPA Waste No. listed as "UN2811" on Hazardous Waste label	HWSA "Waste Cage"	Cannot read Proper Shipping Name due to photograph quality
12	UN1992 Waste Flammable Liquids, Toxic, NOS (Active ingredient Methylene Chloride)	Y	EPA Waste No. listed as "UN1992" on Hazardous Waste label	HWSA "Waste Cage"	Cannot read Proper Shipping Name due to photograph quality
13	UN3175 Waste Solids Containing Flammable Liquid, NOS	Y	D001	HWSA "Waste Cage"	
14	UN1866 (Photograph of label illegible due to photo quality)	Y	Photograph of label illegible due to photo quality.	HWSA "Waste Cage"	Photograph of label illegible due to photo quality.
15	UN1950 Waste Aerosols (Flammable, each not exceeding 1L)	Y	EPA Waste No. listed as "UN1950" on Hazardous Waste label	HWSA "Waste Cage"	
16	UN2735 Waste Amines, Liquid, NOS	Y	D002, D006	HWSA "Waste Cage"	
17	UN2924 Waste Flammable Liquid Corrosive NOS (Isopropyl alcohol, quaternary ammonia compounds)	Y	EPA Waste No. listed as "UN2924" on Hazardous Waste label	HWSA "Waste Cage"	D001 & D002 listed in Proper Shipping Name section of Hazardous Waste label.
18	UN1263 Waste paint related material	Y	EPA Waste No. listed as "UN2924" on Hazardous Waste label	HWSA "Waste Cage"	D007 listed in Proper Shipping Name section of Hazardous Waste label.
19	UN1993 Waste Flammable liquid NOS, (petroleum distillates)	Y	D001, D002, D018, D035, U154, U159	HWSA "Waste Cage"	

20	UN2810 Waste toxic liquids, organic NOS (2,4-D Silver)	Y	D011, D016, D027, D006, D008, D010	HWSA "Waste Cage"	
21	UN3267 Waste corrosive liquid, basic, organic, NOS	Y	EPA Waste No. listed as "UN3267" on Hazardous Waste label	HWSA "Waste Cage"	D002 listed in Proper Shipping Name section of Hazardous Waste label.
22	UN1791 Waste Hypochlorite Solutions	Y	D002	HWSA "Waste Cage"	

See *Figure 1* for a diagram of the approximate layout of the HWAA.

All drums and buckets were on plastic secondary containment pallets with hazardous waste markings, DOT shipping labels as appropriate, accumulation dates and contents clearly marked. Drum # 10 as depicted in *Figure 1*, was a blue, poly, removable head drum with biohazard stickers on the sides, and a paper on the top reading "Do Not Open!". A second piece of paper was on top of the drum with partially obstructed writing. "Waiting on instructions" was visible while the rest of the writing was not visible. Inspector Carew asked about the contents, Ms. Flynn consulted with Brian Hidalgo, a Waste Coordinator, and relayed the drum was empty and was staged in case it is needed to store bodily fluids (See Attachment 1, Photos 19-20). Inspector Meyer recommended empty containers be marked as empty to assist first responders in the event of an emergency.

Two drums were identified by Inspector Meyer as potentially incompatible. The two drums were located on the same secondary containment pallet, drums #16 & #17 in *Figure 1* (See photos 29 – 32 & 41 of Attachment 1). Drum #16 was a blue, poly, removable head drum (See photo 29 of Attachment 1) with DOT shipping labels Class 3 Flammable Liquid, and Class 8 Corrosive. The hazardous waste label contained the following information (See photo 30 of Attachment 1):

- UN 2924 Waste Flammable Liquid Corrosive NOS (Isopropyl Alcohol, Quarternary Ammonia Compounds PGII (RQ D001, D002)
- Accumulation start date: 7 June 2022

Contents of container #16 included three different Lysol brand cleaners.

Drum #17 was a black, poly, removable head drum (See photo 31 of Attachment 1) with DOT shipping label Class 3 Flammable Liquid. The hazardous waste label contained the following information (See photo 32 of Attachment 1):

- RQ UN1263 Waste Paint Related Material, 3 (RQ: D007; ERG #128)
- Accumulation start date: 30 Jun 2022

Contents of container #17 included: acrylic latex caulk plus silicone; face paint; an acrylic sealant; silicone sealant; UV LED color gel; base coat; marine adhesive sealant; non-wipe top coat; water based paint; a polishing agent; aluminum deoxidizer; nail gel; UV acryl gel; fabric paint; and a concrete crack filler.

A copy of the SDSs and a screenshot of the facility's "Gensuite Waste Tracker" system for the two drums were provided by Amazon. Mrs. Flynn stated in a letter that the contents of the drums included various products and the two drums were compatible. No further information requested.

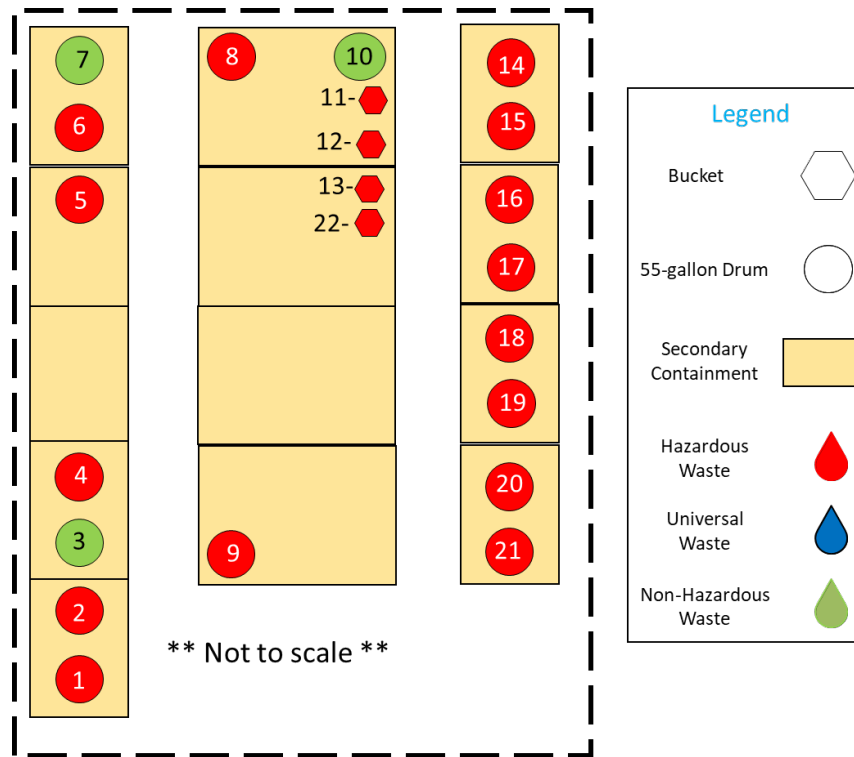


Figure 1 Diagram depicting approximate layout of HWAA "Waste Cage"

Located inside the Waste Cage was an empty flammable locker, spill pads and other spill response equipment and a fire extinguisher. A radio was located inside the Waste Cage for emergency notifications, and WCs carried portable radios to communicate emergencies to Security.

The exterior of the Waste Cage contained various hazardous communications, including a "Danger No Smoking or Open Flame in this Area" sign; "Hazardous Waste Accumulation Area Authorized Personnel Only" sign; "In Case of Emergency" document, listing emergency contact instructions and emergency equipment; and other information.

Satellite Accumulation Area (SAA)

The inspection team was led to "Damage Land", identified as a SAA² by Ms. Flynn. Observed in this area were two cubic yard boxes with non-hazardous waste labels affixed to the sides. Inside the boxes were beverages, cleaning sprays, laundry detergent, and miscellaneous other goods. No hazardous waste was observed in the boxes.

The inspection team was led to the Products Awaiting Disposal Area (PADA). The PADA consisted of two metal shelving units on wheels, each with 6 plastic, yellow bins. Each of the 12 bins had a laminated sheet above with a brief description of the items to be placed in each, and example photos (See photos 47-48 of Attachment 1). No waste was present in the PADA bins at the time of the inspection. Ms. Flynn described the process as associates placing damaged goods

² During the final out-brief, the Regional Environmental Manager clarified there are no SAAs at the facility.

into the bins. WCs periodically remove the hazardous waste and move it to the Waste Cage for proper handling.

The inspection team departed the PADA and Inspector Meyer requested to see the battery charging stations for facility equipment (forklifts, pallet jacks etc.). Ms. Flynn led the team to the “Pit Area”, where battery charging stations are located. This concluded the walk-through portion of the inspection. Facility personnel and the inspection team returned to the conference room.

Upon return to the conference room, an initial out-brief was convened. The inspection team provided an overview of the next steps in the inspection process.

V. RECORDS REVIEW

The inspection team reviewed all documents remotely following the electronic submission made by Amazon.

Manifests/LDR Notifications

The inspection team reviewed hazardous waste manifests and land disposal restriction notifications from shipments made by the facility from January 2021 through December 2021. Copies of the Manifests and LDR Notifications were provided, appeared to be accurate and were consistent with the waste observed on-site. No concerns were noted.

All manifests were signed by facility personnel with documented US Department of Transportation (DOT) Transportation of Dangerous Goods training.

Hazardous Waste Training

Evidence of training and job descriptions for facility personnel with hazardous waste duties was reviewed by the inspection team. All personnel with hazardous waste duties and/or signed hazardous waste manifests have relevant RCRA and DOT training.

Spills and Clean-ups

Amazon did not have any reported spills or clean-ups in recent years.

Permits

The inspection team reviewed the facility’s Storm Water Pollution Prevention Plan (SWPPP) and General Permit for the Discharge of Stormwater Associated with Industrial Activity (general permit) issued by the CT Department of Energy and Environmental Protection (Permit number: GSI002793) and did not note any information relevant to Amazon’s hazardous waste management practices.

Contingency Plan

The inspection team reviewed the facility’s Contingency Plan. Home address and phone numbers of the Emergency Coordinators were not included in the plan. The facility stated the personal information of employees was not included for safety/privacy concerns. During a discussion, the facility proposed including the information in a copy of the plan with limited access, and providing a copy of the plan with the personal information redacted for wider distribution. Inspector Carew contacted Joseph Schiavone of the Connecticut Department of Energy and Environmental Protection for his recommendation. Mr. Schiavone agreed the proposal was

acceptable given cell phone numbers of the Emergency Coordinators would be available to emergency response agencies.

VI. INSPECTION OUTBRIEF

An initial closing conference was conducted on July 27, 2022, prior to leaving the facility. The following personnel were present for the initial closing conference:

EPA: James Carew
Drew Meyer

Amazon: Meghan Flynn
Tyra Declaire
Robbie Morong

EPA Inspectors noted the inspection was still ongoing at this point as there were outstanding records to be reviewed. EPA’s inspection team noted the potential incompatible hazardous waste on the same secondary containment pallet in the Waste Cage. No other areas of concern were observed during the on-site inspection. The inspection team departed the facility at the conclusion of the initial closing conference.

Inspector Carew provided a link via e-mail to a secure EPA OneDrive folder and granted access to designated facility personnel. Amazon added all requested documentation to the OneDrive folder for review. EPA inspectors noted no hazardous waste related areas of concern following a review of the documentation.

A final closing conference was held on August 24, 2022, via Microsoft Teams. In attendance at the final closing conference were:

EPA: James Carew

Amazon: Katherine Cinibulk, Regional Environmental Manager
Denny Wene – Global Governance Manager
Shirley Tarabochia – General Manager
Ray Wilkins – Site WHS manager
Trent Adams – Regional Safety Manager
Michael Soto – Safety Specialist

During the final out-brief EPA Inspector Carew identified the following as potential areas of concern:

1. Compatibility of waste drums stored on the same containment pallet. Inspector Carew requested a copy of the Safety Data Sheets (SDS) and a copy of the information provided by the facility’s “Gensuite Waste Tracker” hazardous waste information system.

A copy of the SDSs and a screenshot of the facility’s “Gensuite Waste Tracker” system for the two drums were provided by Amazon. Mrs. Flynn stated in a letter that the contents of the drums included various products and the two drums were compatible. No further information requested.

2. Contingency Plan. The Contingency Plan did not include the home addresses and phone numbers of all persons qualified to act as emergency coordinator. The facility asked if it would be acceptable to maintain an access restricted copy of the plan with the personal information of the Emergency Coordinator's, and a copy with the personal information redacted available more widely.

Inspector Carew consulted with Connecticut Department of Energy and Environmental Protection (DEEP). DEEP stated a redacting personal information of the Emergency Coordinator's in version of the plans widely available was an acceptable approach, so long as a cell phone number were available.

Katherine Cinibulk, Regional Environmental Manager, clarified the facility does not have any SAAs. The term was used during the on-site inspection but the material in the areas identified as SAAs are awaiting a hazardous waste determination.

At the conclusion of the outbrief, Inspector Carew summarized the enforcement tools available to EPA, including non-formal responses and formal responses with penalties. The Inspector explained that a copy of the completed final trip report would be provided after completion and the facility can contact Inspector Carew with any questions or concerns.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I-NEW ENGLAND

Amazon.com Services, LLC (BDL2)
200 Old Iron Ore Road, Windsor, CT 06095
Inspection Date 07/26/2022

Attachment 1

Photograph Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I-NEW ENGLAND

Amazon.com Services, LLC (BDL2)
200 Old Iron Ore Road, Windsor, CT 06095
Inspection Date 07/26/2022

Photo #	Description
1	Container #1, drum in Hazardous Waste Storage Area "The Cage"
2	Hazardous Waste marking on waste container #1 in Hazardous Waste Storage Area "The Cage"
3	Container #2, drum in Hazardous Waste Storage Area "The Cage"
4	Hazardous Waste marking on waste container #2 in Hazardous Waste Storage Area "The Cage"
5	Container #3, drum marked as "Non-Regulated Material" in Hazardous Waste Storage Area "The Cage"
6	Marking on waste container #3 with "Non-Regulated Material" sticker in Hazardous Waste Storage Area "The Cage"
7	Container #4, drum in Hazardous Waste Storage Area "The Cage"
8	Hazardous Waste marking container #4 drum in Hazardous Waste Storage Area "The Cage"
9	Container #5, drum in Hazardous Waste Storage Area "The Cage"
10	Hazardous Waste marking on container #5 in Hazardous Waste Storage Area "The Cage"
11	Container #6, drum in Hazardous Waste Storage Area "The Cage"
12	Hazardous Waste marking on container #6 in Hazardous Waste Storage Area "The Cage"
13	Container #7, drum marked as "Non-Regulated Material" in Hazardous Waste Storage Area "The Cage"
14	Marking on container #7 with "Non-Regulated Material" sticker in Hazardous Waste Storage Area "The Cage"
15	Container #8, drum in Hazardous Waste Storage Area "The Cage"
16	Hazardous Waste marking on container #8 in Hazardous Waste Storage Area "The Cage"
17	Container #9, drum in Hazardous Waste Storage Area "The Cage"
18	Hazardous Waste marking on container #9 in Hazardous Waste Storage Area "The Cage"



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I-NEW ENGLAND

Amazon.com Services, LLC (BDL2)
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Photo #	Description
19	Container #10, drum in marked as "Bio Hazard" in Hazardous Waste Storage Area "The Cage"
20	Marking on container #10 with "Do Not Open" & "Waiting on Instructions" warnings in Hazardous Waste Storage Area "The Cage"
21	Container #11 in Hazardous Waste Storage Area "The Cage"
22	Container #12 in Hazardous Waste Storage Area "The Cage"
23	Container #13 in Hazardous Waste Storage Area "The Cage"
24	Container #14 in Hazardous Waste Storage Area "The Cage"
25	Container #15 in Hazardous Waste Storage Area "The Cage"
26	Hazardous Waste marking on container #15 in Hazardous Waste Storage Area "The Cage"
27	Container #16, drum in Hazardous Waste Storage Area "The Cage"
28	Hazardous Waste marking on container #16 in Hazardous Waste Storage Area "The Cage"
29	Container #17, drum in Hazardous Waste Storage Area "The Cage"
30	Hazardous Waste marking on container #17 in Hazardous Waste Storage Area "The Cage"
31	Container #18, drum in Hazardous Waste Storage Area "The Cage"
32	Hazardous Waste marking on container #18 in Hazardous Waste Storage Area "The Cage"
33	Container #19, drum in Hazardous Waste Storage Area "The Cage"
34	Hazardous Waste marking on container #19 in Hazardous Waste Storage Area "The Cage"
35	Container #20 in Hazardous Waste Storage Area "The Cage"
36	Hazardous Waste marking on container #19 in Hazardous Waste Storage Area "The Cage"
37	Container #21, drum in Hazardous Waste Storage Area "The Cage"
38	Hazardous Waste marking on container #20 in Hazardous Waste Storage Area "The Cage"



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Photo #	Description
39	Container #22 in Hazardous Waste Storage Area "The Cage"
40	Hazardous Waste marking on container #21 in Hazardous Waste Storage Area "The Cage"
41	Overview of Hazardous Waste Storage Area "The Cage"
42	Eye wash station in Hazardous Waste Storage Area "The Cage"
43	Hazard Communication on outside of Hazardous Waste Storage Area "The Cage"
44	Non-Hazardous Waste damaged products for disposal
45	Non-Hazardous Waste sticker on cubic yard box of damaged products for disposal
46	Contents of cubic yard box with Non-Hazardous Waste label
47	"Product Awaiting Disposal Area"
48	"Prod Awaiting Disposal" stencil on floor
49	Battery charging station for facility equipment



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Photo No. 5

Facility Name:	Amazon.com Services, LLC (BDL2)
Facility Address:	200 Old Iron Ore Road, Windsor, CT 06095
Photographer:	James Carew
Date images taken:	26 July 2022





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Photo No. 2

Facility Name:	Amazon.com Services, LLC (BDL2)
Facility Address:	200 Old Iron Ore Road, Windsor, CT 06095
Photographer:	James Carew
Date images taken:	26 July 2022





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Photo No. 3

Facility Name:	Amazon.com Services, LLC (BDL2)
Facility Address:	200 Old Iron Ore Road, Windsor, CT 06095
Photographer:	James Carew
Date images taken:	26 July 2022





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Photo No. 4

Facility Name:	Amazon.com Services, LLC (BDL2)
Facility Address:	200 Old Iron Ore Road, Windsor, CT 06095
Photographer:	James Carew
Date images taken:	26 July 2022





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Photo No. 5

Facility Name:	Amazon.com Services, LLC (BDL2)
Facility Address:	200 Old Iron Ore Road, Windsor, CT 06095
Photographer:	James Carew
Date images taken:	26 July 2022



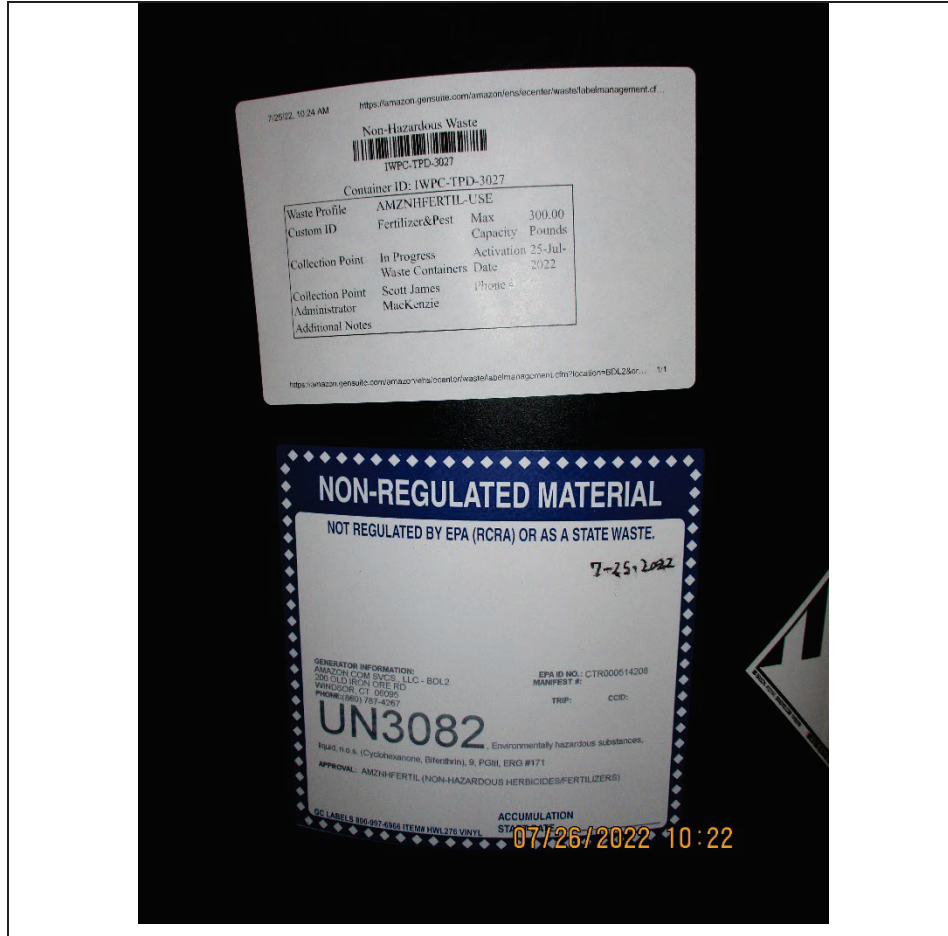


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Photo No. 6

Facility Name:	Amazon.com Services, LLC (BDL2)
Facility Address:	200 Old Iron Ore Road, Windsor, CT 06095
Photographer:	James Carew
Date images taken:	26 July 2022





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Photo No. 7

Facility Name:	Amazon.com Services, LLC (BDL2)
Facility Address:	200 Old Iron Ore Road, Windsor, CT 06095
Photographer:	James Carew
Date images taken:	26 July 2022





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Photo No. 8

Facility Name:	Amazon.com Services, LLC (BDL2)
Facility Address:	200 Old Iron Ore Road, Windsor, CT 06095
Photographer:	James Carew
Date images taken:	26 July 2022





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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Amazon.com Services, LLC (BDL2)
200 Old Iron Ore Road, Windsor, CT 06095
Inspection Date 07/26/2022

Photo No. 9

Facility Name:	Amazon.com Services, LLC (BDL2)
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Photographer:	James Carew
Date images taken:	26 July 2022





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Amazon.com Services, LLC (BDL2)
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Inspection Date 07/26/2022

Photo No. 10

Facility Name:	Amazon.com Services, LLC (BDL2)
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Photographer:	James Carew
Date images taken:	26 July 2022





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Amazon.com Services, LLC (BDL2)
200 Old Iron Ore Road, Windsor, CT 06095
Inspection Date 07/26/2022

Photo No. 11

Facility Name:	Amazon.com Services, LLC (BDL2)
Facility Address:	200 Old Iron Ore Road, Windsor, CT 06095
Photographer:	James Carew
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Amazon.com Services, LLC (BDL2)
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Inspection Date 07/26/2022

Photo No. 12

Facility Name:	Amazon.com Services, LLC (BDL2)
Facility Address:	200 Old Iron Ore Road, Windsor, CT 06095
Photographer:	James Carew
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Amazon.com Services, LLC (BDL2)
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Inspection Date 07/26/2022

Photo No. 13

Facility Name:	Amazon.com Services, LLC (BDL2)
Facility Address:	200 Old Iron Ore Road, Windsor, CT 06095
Photographer:	James Carew
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Photo No. 14

Facility Name:	Amazon.com Services, LLC (BDL2)
Facility Address:	200 Old Iron Ore Road, Windsor, CT 06095
Photographer:	James Carew
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Amazon.com Services, LLC (BDL2)
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Photo No. 15

Facility Name:	Amazon.com Services, LLC (BDL2)
Facility Address:	200 Old Iron Ore Road, Windsor, CT 06095
Photographer:	James Carew
Date images taken:	26 July 2022



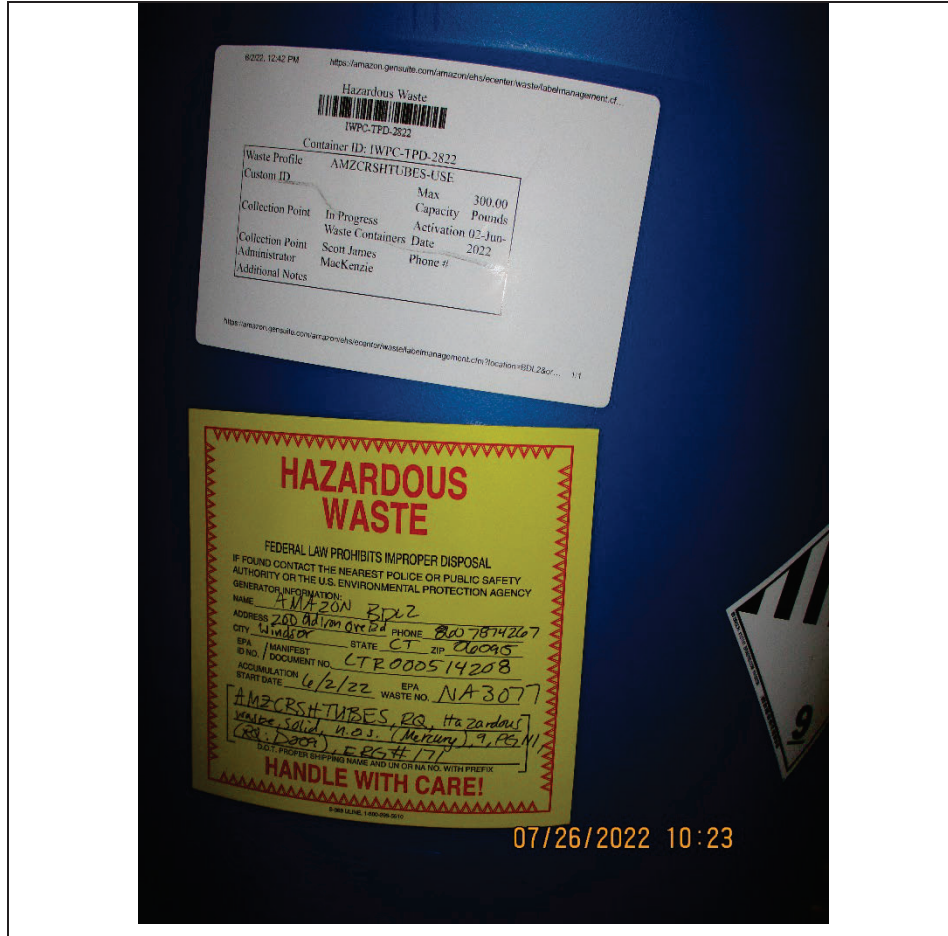


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Amazon.com Services, LLC (BDL2)
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Inspection Date 07/26/2022

Photo No. 16

Facility Name:	Amazon.com Services, LLC (BDL2)
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Photographer:	James Carew
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Photo No. 17

Facility Name:	Amazon.com Services, LLC (BDL2)
Facility Address:	200 Old Iron Ore Road, Windsor, CT 06095
Photographer:	James Carew
Date images taken:	26 July 2022



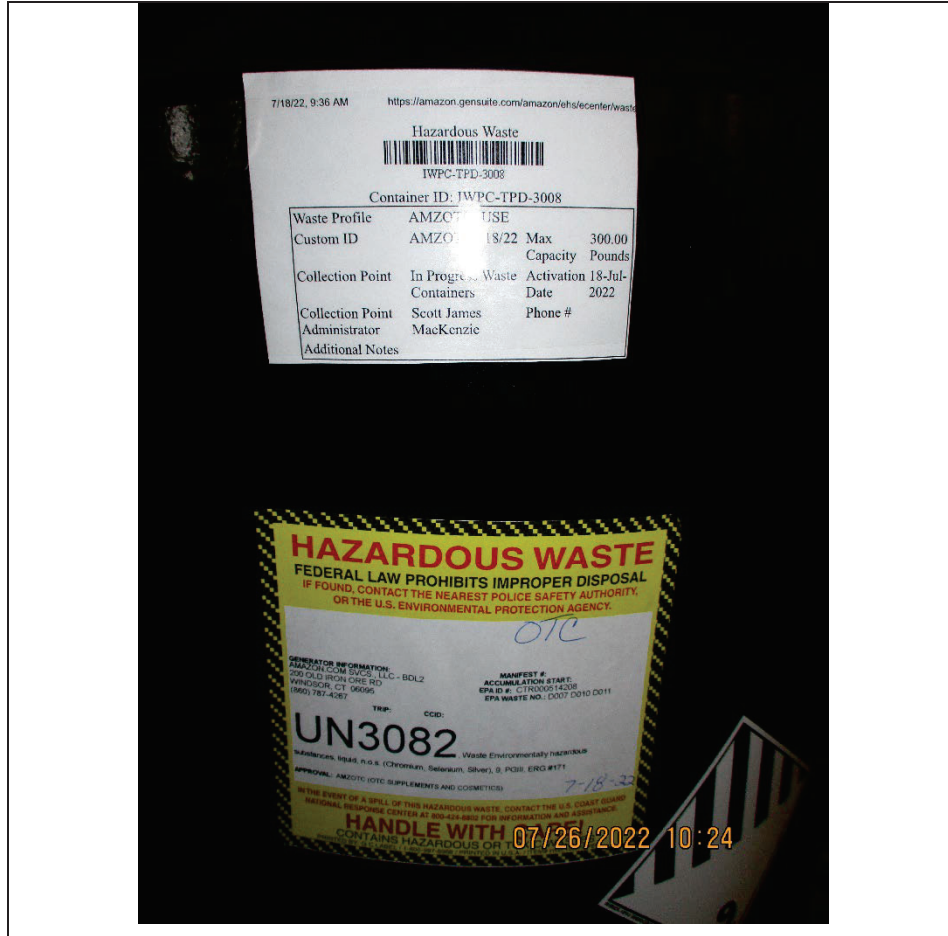


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Amazon.com Services, LLC (BDL2)
200 Old Iron Ore Road, Windsor, CT 06095
Inspection Date 07/26/2022

Photo No. 18

Facility Name:	Amazon.com Services, LLC (BDL2)
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Photographer:	James Carew
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Photo No. 19

Facility Name:	Amazon.com Services, LLC (BDL2)
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Photographer:	James Carew
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Photo No. 20

Facility Name:	Amazon.com Services, LLC (BDL2)
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Photo No. 21

Facility Name:	Amazon.com Services, LLC (BDL2)
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Photographer:	James Carew
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Photo No. 22

Facility Name:	Amazon.com Services, LLC (BDL2)
Facility Address:	200 Old Iron Ore Road, Windsor, CT 06095
Photographer:	James Carew
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Photo No. 23

Facility Name:	Amazon.com Services, LLC (BDL2)
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Photographer:	James Carew
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Photo No. 24

Facility Name:	Amazon.com Services, LLC (BDL2)
Facility Address:	200 Old Iron Ore Road, Windsor, CT 06095
Photographer:	James Carew
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Amazon.com Services, LLC (BDL2)
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Photo No. 25

Facility Name:	Amazon.com Services, LLC (BDL2)
Facility Address:	200 Old Iron Ore Road, Windsor, CT 06095
Photographer:	James Carew
Date images taken:	26 July 2022



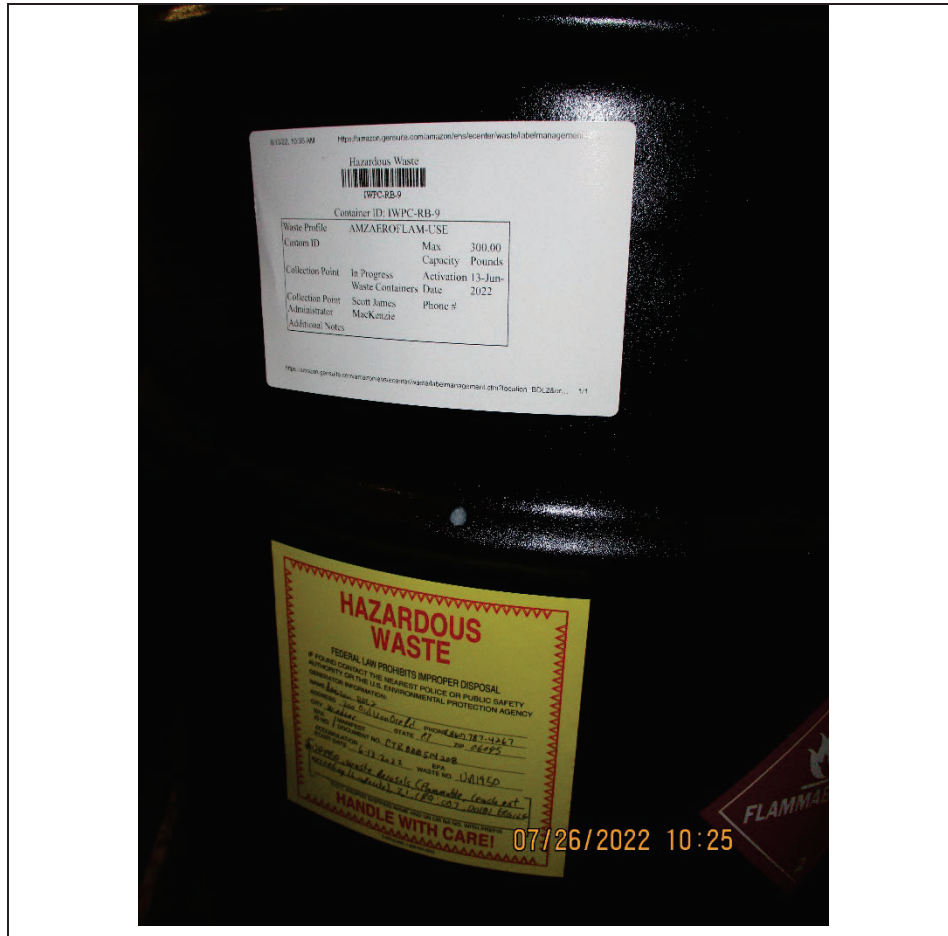


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Amazon.com Services, LLC (BDL2)
200 Old Iron Ore Road, Windsor, CT 06095
Inspection Date 07/26/2022

Photo No. 26

Facility Name:	Amazon.com Services, LLC (BDL2)
Facility Address:	200 Old Iron Ore Road, Windsor, CT 06095
Photographer:	James Carew
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Amazon.com Services, LLC (BDL2)
200 Old Iron Ore Road, Windsor, CT 06095
Inspection Date 07/26/2022

Photo No. 27

Facility Name:	Amazon.com Services, LLC (BDL2)
Facility Address:	200 Old Iron Ore Road, Windsor, CT 06095
Photographer:	James Carew
Date images taken:	26 July 2022



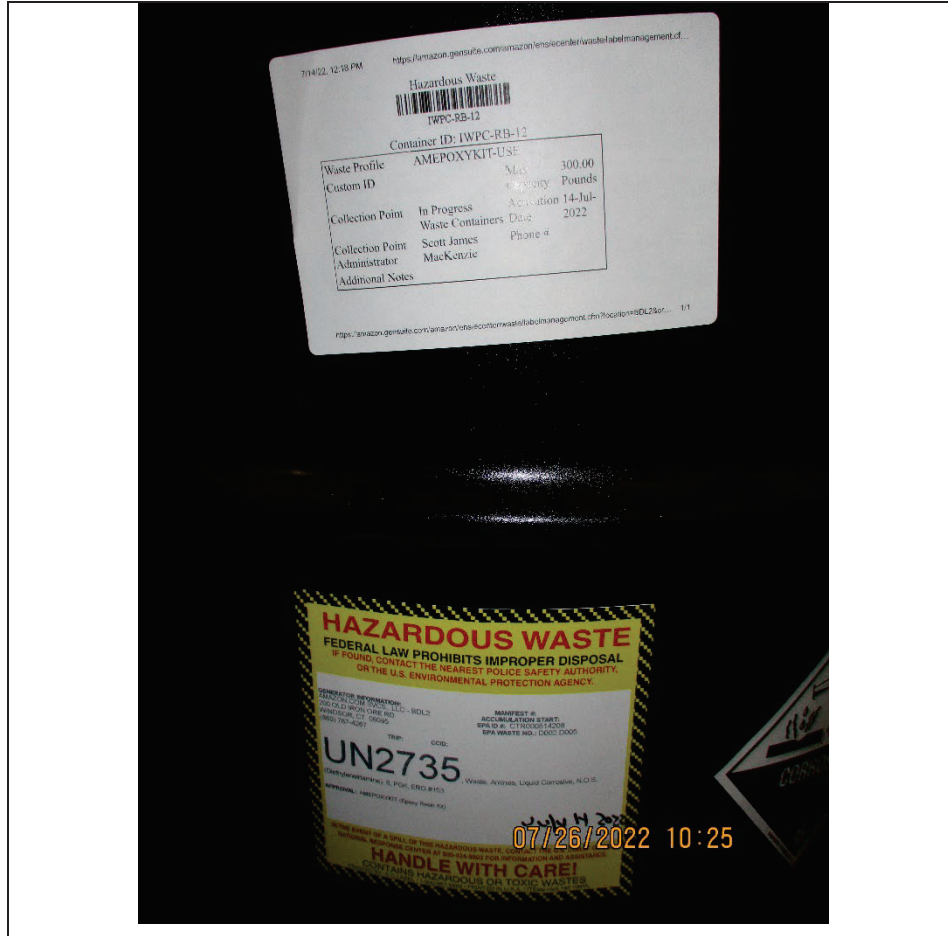


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Amazon.com Services, LLC (BDL2)
200 Old Iron Ore Road, Windsor, CT 06095
Inspection Date 07/26/2022

Photo No. 28

Facility Name:	Amazon.com Services, LLC (BDL2)
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Photographer:	James Carew
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Photo No. 29

Facility Name:	Amazon.com Services, LLC (BDL2)
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Photo No. 30

Facility Name:	Amazon.com Services, LLC (BDL2)
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Photo No. 31

Facility Name:	Amazon.com Services, LLC (BDL2)
Facility Address:	200 Old Iron Ore Road, Windsor, CT 06095
Photographer:	James Carew
Date images taken:	26 July 2022



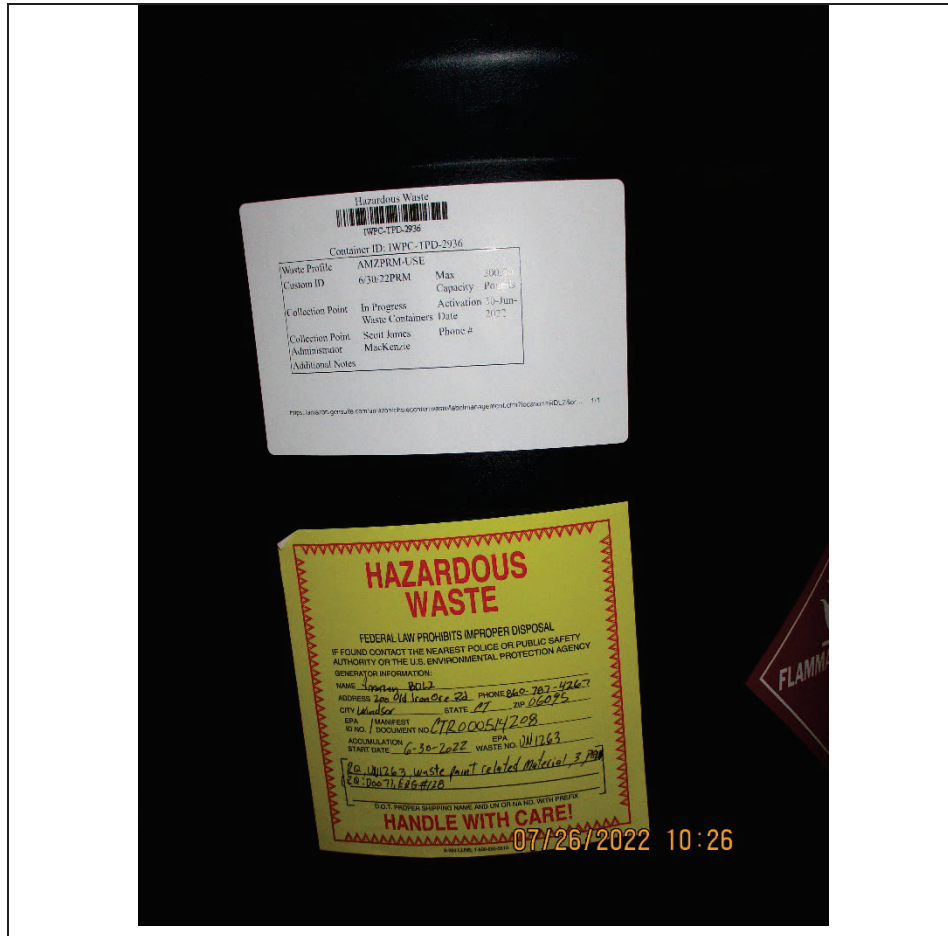


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Amazon.com Services, LLC (BDL2)
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Inspection Date 07/26/2022

Photo No. 32

Facility Name:	Amazon.com Services, LLC (BDL2)
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Photographer:	James Carew
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Photo No. 33

Facility Name:	Amazon.com Services, LLC (BDL2)
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Photographer:	James Carew
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Photo No. 34

Facility Name:	Amazon.com Services, LLC (BDL2)
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Photographer:	James Carew
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Photo No. 35

Facility Name:	Amazon.com Services, LLC (BDL2)
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Photographer:	James Carew
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Photo No. 36

Facility Name:	Amazon.com Services, LLC (BDL2)
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Photographer:	James Carew
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Inspection Date 07/26/2022

Photo No. 37

Facility Name:	Amazon.com Services, LLC (BDL2)
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Photographer:	James Carew
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Photo No. 38

Facility Name:	Amazon.com Services, LLC (BDL2)
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Photographer:	James Carew
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Photo No. 39

Facility Name:	Amazon.com Services, LLC (BDL2)
Facility Address:	200 Old Iron Ore Road, Windsor, CT 06095
Photographer:	James Carew
Date images taken:	26 July 2022



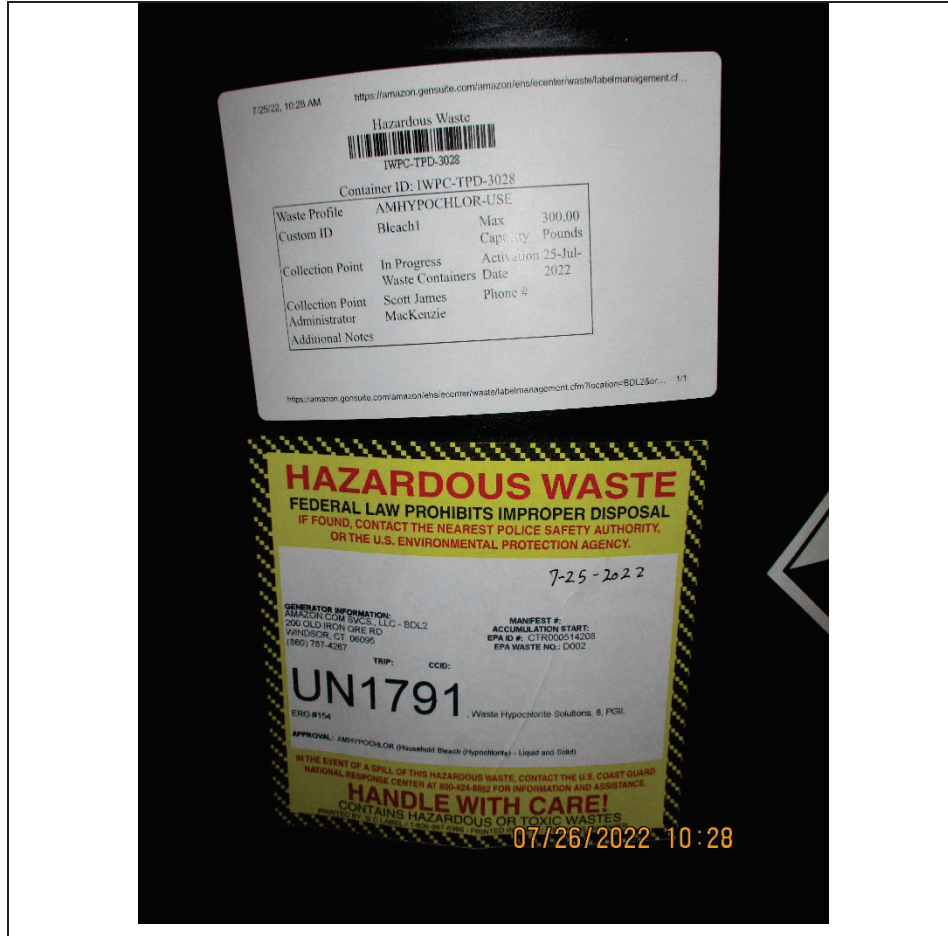


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Amazon.com Services, LLC (BDL2)
 200 Old Iron Ore Road, Windsor, CT 06095
 Inspection Date 07/26/2022

Photo No. 40

Facility Name:	Amazon.com Services, LLC (BDL2)
Facility Address:	200 Old Iron Ore Road, Windsor, CT 06095
Photographer:	James Carew
Date images taken:	26 July 2022



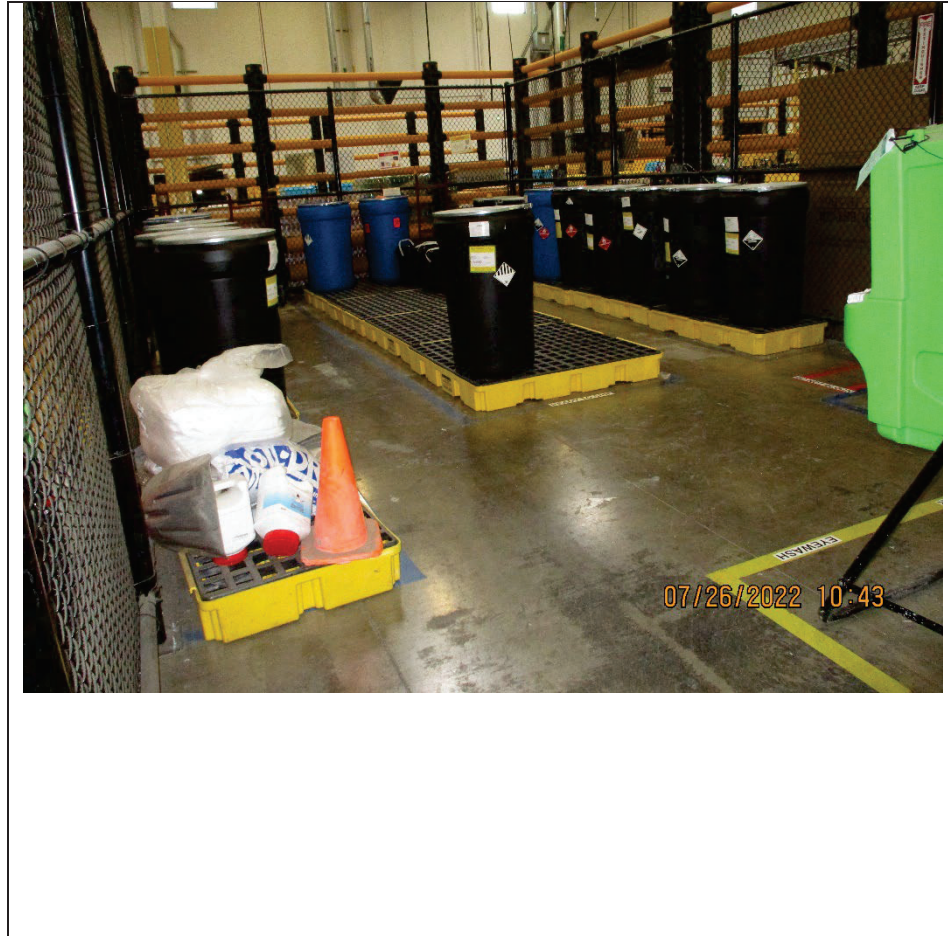


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Amazon.com Services, LLC (BDL2)
200 Old Iron Ore Road, Windsor, CT 06095
Inspection Date 07/26/2022

Photo No. 41

Facility Name:	Amazon.com Services, LLC (BDL2)
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Photographer:	James Carew
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Amazon.com Services, LLC (BDL2)
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Photo No. 42

Facility Name:	Amazon.com Services, LLC (BDL2)
Facility Address:	200 Old Iron Ore Road, Windsor, CT 06095
Photographer:	James Carew
Date images taken:	26 July 2022



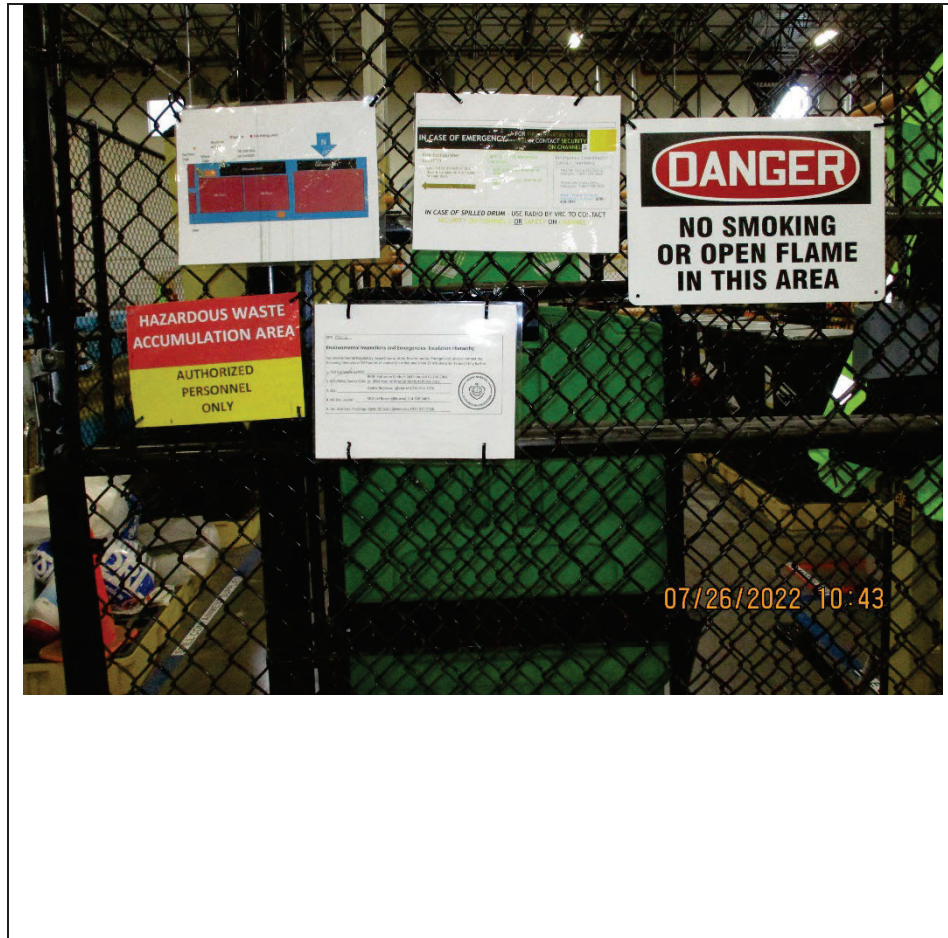


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Amazon.com Services, LLC (BDL2)
200 Old Iron Ore Road, Windsor, CT 06095
Inspection Date 07/26/2022

Photo No. 43

Facility Name:	Amazon.com Services, LLC (BDL2)
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Photographer:	James Carew
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Photo No. 44

Facility Name:	Amazon.com Services, LLC (BDL2)
Facility Address:	200 Old Iron Ore Road, Windsor, CT 06095
Photographer:	James Carew
Date images taken:	26 July 2022



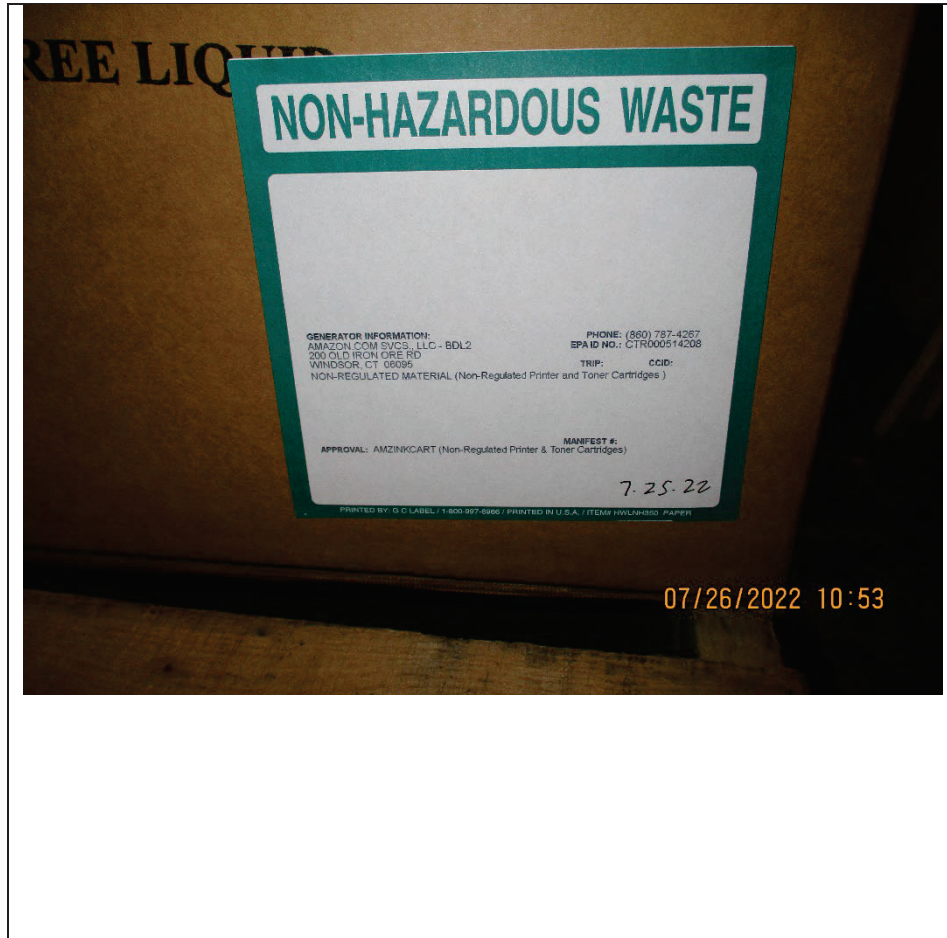


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Amazon.com Services, LLC (BDL2)
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Inspection Date 07/26/2022

Photo No. 45

Facility Name:	Amazon.com Services, LLC (BDL2)
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Photographer:	James Carew
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Photo No. 46

Facility Name:	Amazon.com Services, LLC (BDL2)
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Photographer:	James Carew
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Photo No. 47

Facility Name:	Amazon.com Services, LLC (BDL2)
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Photographer:	James Carew
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Photo No. 48

Facility Name:	Amazon.com Services, LLC (BDL2)
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Photographer:	James Carew
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Photo No. 49

Facility Name:	Amazon.com Services, LLC (BDL2)
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Photographer:	James Carew
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