UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MA 02109-3912

URGENT LEGAL MATTER
REQUIRES PROMPT RESPONSE

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

FEB 2 7 2014

Michaela A. Saccoccio, Manager
United States Postal Service
55 Corliss Street
Providence, RI 02904-9722

Re: Clean Air Act Reporting Requirement

Dear Ms. Saccoccio:

The United States Environmental Protection Agency ("EPA") is evaluating whether the United States Postal Service, located at 55 Corliss Street in Providence, Rhode Island ("USPS") is in compliance with the Clean Air Act ("CAA" or "Act") and requirements promulgated under the Act. These include; the National Emission Standards for Miscellaneous Metal Parts and Products Surface Coating Operations found at 40 CFR Part 63, Subpart MMMM; the National Emission Standards for Hazardous Air Pollutants for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources found at 40 CFR Part 63, Subpart HHHHHH; and the Stratospheric Ozone regulations found at 40 CFR Part 82, Subpart F.

Section 114(a)(1) of the Act, 42 U.S.C. Section 7414(a)(1), gives EPA the authority to require any person who owns or operates any emission source to establish and maintain records, make reports, sample emissions, and provide such other information as may reasonably be required to enable EPA to determine whether such person is in compliance with the Act and its implementing regulations.

This reporting requirement orders the USPS to provide the information listed in each numbered paragraph below within sixty (60) days of receipt of this letter. If USPS does not possess some or all of the records or documents that respond to a specific request below, the USPS shall provide a written explanation for its inability to respond.

1. All relevant "Standard Industrial Classification" ("SIC") codes and "North American Industry Classification System" ("NAICS") codes that apply to the Facility.

Toll Free • 1-888-372-7341
Internet Address (URL) • http://www.epa.gov/region1
Recycled/Recyclable • Printed with Vegetable Oil Based Inks on Recycled Paper (Minimum 30% Postconsumer)

2. For any equipment resurfacing, painting, or metal cleaning operations of vehicles, provide:
    a. A list of the types of coatings used, including the volatile organic compounds (VOCs) and hazardous air pollutants (HAPs) content of each coating (in pounds per gallon);
    b. A list of all coatings containing any of the following HAPs: chromium (Cr); lead (Pb); manganese (Mn); nickel (Ni); or cadmium (Cd).

3. For each temporary or permanent spray painting booths, buildings, or areas located at the facility from January 2009 to the present, provide the following information:
    a. The name/identifier and location of the spray painting booths, buildings, or areas;
    b. The date that actual construction began on the spray painting booths, buildings, or areas;
    c. The date that actual construction was completed on the spray painting booths, buildings, or areas;
    d. The date that any surface coating operations began in the spray painting booths, buildings, or areas;
    e. A description of any air pollution control equipment ; and
    f. A description of any practices utilized to limit air emissions from the spray painting booths, buildings, or areas.

4. For the calendar years 2012 and 2013, provide the maximum number of gallons of coating used at the facility in any one hour and in any one day. Also provide the highest VOC content of the coating in lbs of VOC per gallon of coating.

5. Describe the spray guns used at the facility. For each spray gun, provide the following information (include any spray guns that were used since the year 2010 but are no longer in use):
    a. The manufacturer;
    b. The model number;
    c. The nozzles used;
    d. The actual operating pressure range by nozzle used (in pounds per square inch);
    e. The maximum flow rate (in gallons per hour);
    f. The month and year of acquisition or purchase; and
    g. The month and year it was first used at the facility.
    h. The date it was removed from service (if relevant).

6. For any solvent-based degreasing units or parts washers used to clean metal parts, provide:
    a. The make, model, capacity (in gallons) of each unit; and
    b. The material safety data sheet (MSDS) for the solvent used in each unit.

7. Provide a list of the refrigeration units with refrigerant capacities of more than 50 pounds:

a. Identify whether each unit is an industrial refrigeration unit, commercial refrigeration unit, comfort cooler, or other type (if other type, explain its function);
b. For each refrigeration unit, state the quantity of refrigerant (in pounds) the unit holds at full charge, the type of refrigerant used, and the date the full charge was most recently determined; and
c. Provide a description of the refrigeration unit's location, along with its name, serial number, or other identification used by USPS.

8. For each refrigeration unit on site with a capacity of more than 50 pounds, provide copies of any work logs, service tickets, invoices, and other documents maintained by USPS that relate to service and repair between January 1, 2011 and the present. These records should include:
    a. The date any service was performed;
    b. The date any refrigerant leaks were discovered and amount of refrigerant that leaked;
    c. A detailed description of all repair work done in association with each refrigerant leak (if repairs were not conducted, explain why);
        i. The date each refrigerant leak repair was conducted;
        ii. The amount of new refrigerant added; and
        iii. The name of the technician who performed the work.

9. Provide the name(s) of all employees of USPS who maintain, service, remove, repair, or dispose of refrigeration units.
    a. Provide the date of certification for each technician.
    b. Indicate the level of certification, and provide a copy of each technician's certificate.

10. For each piece of refrigerant recovery/recycling equipment used on site indicate:
    a. Whether it is certified equipment under 40 C.F.R. §82.158;
    b. If so, whether USPS has certified to EPA that the equipment is certified, in accordance with 40 C.F.R. §82.162.

Submissions required by this letter shall be mailed to:

Susan Studlien, Director
Office of Environmental Stewardship
U.S. Environmental Protection Agency, Region 1
5 Post Office Square, Suite 100
Boston, Massachusetts 02109-3912
Attn: Abdi T. Mohamoud (OES 04-2)

Be aware that if USPS does not provide the information in a timely manner, EPA may order it to comply and may assess monetary penalties under Section 113 of the Clean Air Act. Federal law also establishes criminal penalties for providing false information to EPA. This letter is not

subject to Office of Management and Budget review pursuant to the Paperwork Reduction Act, 44 U.S.C. Chapter 35.

You may assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 CFR § 2.203(b). Information covered by such a claim will be disclosed by EPA only to the extent, and by means of the procedures, set forth in 40 CFR Part 2, Subpart B. Note that certain categories of information, such as emission data, are not properly the subject of such a claim. If no such claim accompanies the information when EPA receives it, EPA may make the information available to the public without further notice to you.

If you have any questions regarding this reporting requirement, please contact Abdi Mohamoud, Environmental Engineer, at (617) 918-1858, or have your attorney call Tom Olivier, Senior Enforcement Counsel, at (617) 918-1737.

Sincerely,

Sam Silverman, acting for

Susan Studlien, Director
Office of Environmental Stewardship

cc: Ted Burns, RI DEM

Enclosures