

Hazardous Waste Section  
File Room Document Transmittal Sheet

17

Your Name: Kathleen Z. Lawson  
EPA ID: NCD049773245  
Facility Name: Trex Properties  
Document Group: Permit (P)  
Document Type: Permitting Information (PI)  
Description: Review of Updated Closure Report. Clean closure not achieved.  
Date of Doc: 6/2/2016  
Author of Doc: Kathleen Z. Lawson

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June 2, 2016

Thomas Roberts  
Manager  
Trex Properties, LLC  
1650 Des Peres Road, Suite 306  
St. Louis, Missouri 63131

Re: Updated Draft Phase III RCRA Facility Investigation Report

Trex Properties, LLC  
Charlotte, North Carolina  
EPA ID # NCD 049 773 245

Dear Mr. Roberts,

A review has been completed your Closure Report dated February 24, 2016. Based on the analytical results, the secondary containment for Unit #4 is not clean. PCE was detected in the final rinsate sample at a concentration of 1.1 ug/L, which exceeds the laboratory detection limits and the NC Groundwater Quality Standard of 0.7 ug/L.

40 CFR 264.197 stipulates that “the owner or operator must remove or decontaminate all waste residues, contaminated containment system components (liners, etc.), contaminated soils, and structures and equipment contaminated with waste, and manage them as hazardous waste.” The fact that PCE is still showing up in the rinse water indicates that there is PCE residue in the containment system.

According to EPA, clean closure performance standards may be based on non-detection levels for specific organic hazardous constituents. A non-detect value should be set at least to the practical quantitation limits (“PQL”) as established by Test Methods for Evaluating Solid Waste, SW-846, U.S. Environmental Protection Agency, Third Edition, November 1986 (“SW-846”) or equivalent. The use of non-detect for the clean closure performance standards would require that the certified contract laboratory conducting the analysis include the specific concentrations for non-detect based on the analytical instrument used to detect the constituent.

Your options at this point are to clean the unit until the PCE in the rinse water is below the practical quantitation detection limits or remove the concrete that comprises the secondary containment from Unit #4. Note that the soil beneath the secondary containment will be addressed under the corrective action measures for the site. Notify us within two weeks of which method you plan to pursue to achieve clean closure.

Mr. Roberts  
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If you have any questions, please feel free to contact me at 919-707-8214 or  
Kathleen.lawson@ncdenr.gov

Sincerely,



Kathleen Z. Lawson, Environmental Engineer  
Division of Waste Management, NC DEQ

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