

Parris, Bruce

From: Powers, John
Sent: Friday, December 17, 2010 12:08 PM
To: Parris, Bruce
Cc: Beverly, Trudy; Doorn, Peter
Subject: RE: US 2.50 Cleaners, Lincoln Co, New Site

Bruce,

We are only aware of this facility in the compliance side of DSCA because we inspected it in Nov. 2009. It is an active perc dry cleaner. We will send the owner and dry cleaner invitation letters to come into DSCA. If they decline or do not respond in within the time requested, we will refer the site back to you, which should be sometime in February by my estimation. Either way whether they accept the invitation or not, we will let you know.

Thanks,
John

From: Parris, Bruce
Sent: Monday, December 13, 2010 5:30 PM
To: Powers, John
Cc: Beverly, Trudy
Subject: US 2.50 Cleaners, Lincoln Co, New Site

John,
We've received a new site notification form regarding a dry cleaning operation. I don't know whether they have reported themselves to your program or not. We'll list the site in our inventory but hold off on sending the drycleaner a NORR until we hear back from your program as to whether or not you were successful in soliciting their involvement. If you all don't plan to solicit them, please let us know that too so we can go ahead and pursue them. The current property owner only owns the site through foreclosure. The Phase II ESA was conducted and found shallow soil PCE contamination at low levels at the former dry cleaning operation but no other testing was conducted. The soil contamination levels were below IHSB health based goals but over POG (protection of groundwater) criteria if using the table numbers. Of course, the Phase II ESA was insufficient to determine if the detected concentrations are representative or just the edge of a larger problem. Additional assessment would be needed by the dry cleaner to appropriately characterize the site, which is what we would require if we pursue the dry cleaner.

I've attached the documents that we received for your assistance. Let me know if you need further information.
Thanks!
Bruce

Bruce Parris - Bruce.Parris@ncdenr.gov
Environmental Supervisor II, Western Region
North Carolina Dept. of Environment & Natural Resources
Div. of Waste Mgt. - Superfund Section - Inactive Hazardous Sites Branch
Mooresville Regional Office
610 East Center Street, Suite 301
Mooresville, NC 28115
Ph: (704) 663-1699 Fax: (704) 663-6040

E-mail correspondence to and from this address may be subject to the North Carolina Public Records Law and may be disclosed to third parties.

NORTH CAROLINA DIVISION OF WASTE MANAGEMENT
Dry Cleaning Solvent Cleanup Act (DSCA) Compliance Program
 Outreach Inspection Report
 Date: 11/18/2009

Facility Identification
US 2.50 Cleaners Facility ID: 550005C DAQ ID: -- EPA Generator ID: -- County/FIPS: Lincoln/109

Facility Data	Compliance Data
US 2.50 Cleaners 7558 NC Hwy 73 #101 Denver, NC 28037 Lat: 35.442959 Long: -80.991933 SIC : 7216 / Dry Cleaning Plants, Except Rugs NAICS: 81232 / Drycleaning and Laundry Services (except Coin-Operated) Date of Facility Establishment: 2007	Inspection Date: 11/18/2009 Time In: 8:30 am Time Out: 10:15 am Inspector(s): ADR Operating Status: O/Operating Compliance Code(s): M-MMP violation Action Code: 00/ Outreach Training visit

Contact Data			Classification Data
Facility Contact Paul Lee 7558 NC Hwy 73 #101 Denver, NC 28037 (704) 827-8300	Facility Owner Paul Lee 7558 NC Hwy 73 #101 Denver, NC 28037 (704) 827-8300	Property Owner Denver Square LLC 3440 Toringdon Way, Ste 205 Charlotte NC 28277	Solvent: Perchloroethylene System: Dry-to-Dry Installation Date: 2007 Installation Category: New Consumption Category: Small HW Generator Status: CESQG DSCA Site Number : N/A

Inspector's Signature: Date of Signature:	Comments: Outreach CA letter issued by certified mail November 24, 2009 NESHAP, MMP, and RCRA procedural and recordkeeping requirements Recommend follow up inspection no later than November 2010
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(I) DIRECTIONS: From the Mooresville Regional Office at 610 East Center Avenue in Mooresville, go west on East Center Avenue. Turn left onto S. Main St. (NC-152). Turn right onto W. McClelland Ave. (NC-152). Turn left onto NC-150. Merge onto I-77 South and proceed approximately 10 miles. Take Exit 25 (NC-73) toward Concord / Huntersville, and turn right onto Sam Furr Road. Continue to follow NC-73 West for approximately 8 miles. The dry cleaning facility is located on the left at 7558 NC Hwy 73, suite 101 in the Pilot Knob Square shopping center.

(II) FACILITY DESCRIPTION: US 2.50 Cleaners is classified as a new small dry cleaner facility, which has been owned by Mr. Paul Lee, since 2006. Originally the facility was a pickup location until 2007, when the dry cleaning machine was installed. The facility was utilizing the machine until the summer of 2009, when the store became a pickup store for a plant "2.50 Cleaners" located in Mooresville. US 2.50 Cleaners does not service other pickup locations.

US 2.50 Cleaners utilizes a 4th Generation dry-to-dry Union L740 U2000 dry cleaning machine that is equipped with secondary containment, refrigerated condenser, and secondary carbon adsorber. US 2.50 Cleaners is a small area source, purchasing 45 gallons of solvent during the previous 12 months. Based on the quantity of hazardous waste stored on site and historically generated at the facility, US 2.50 Cleaners is considered to be classified as a Conditionally Exempt Small Quantity Generator (CESQG) at the time of the inspection. US 2.50 Cleaners uses Safety Kleen as the primary transporter to deliver the facility generated hazardous waste to the TSD facility, which is also owned and operated by Safety Kleen.

Dry Cleaning Equipment Summary

Machine Number	Type of Machine	Manufacturer	Model #	Serial #	Date (year) of manufacture	Date (year) Of Installation	Solvent used	Observed Operating?
1	Dry to dry	Union	L740 U2000	301-I7-0806	2007	2007	Perc	No

(III) INSPECTION SUMMARY: On November 18, 2009, Alicia Roh, Compliance Inspector, with the North Carolina Division of Waste Management, Dry Cleaning Solvent Cleanup Act (DSCA) Program conducted an outreach training visit at US 2.50 Cleaners. The inspector met with Mr. Paul Lee, store owner, who provided access to the facility's equipment and available records.

The following is a summary of US 2.50 Cleaner's compliance with respect to the DSCA Required Minimum Management Practices provided in 15A NCAC 02S.0202, National Emission Standards for Hazardous Air Pollutants (NESHAP) found in 40 CFR Part 63 Subpart M and Resource Conservation and Recovery Act (RCRA) referenced in 40 CFR part 261.5 and 262.

Although the machine was operable, it was not observed in operation during the outreach visit. Mr. Lee explained that due to the economy, the machine had not been utilized since the summer of 2009. Mr. Lee turns on the machine for about 10 minutes once per week to keep it functioning and not let it sit. Clothes are sent to his other plant "2.50 Cleaners" in Mooresville for processing.

The water separator appeared to be manually collected, as there was no collection container observed. The muck cleanout container was devoid of waste. The filter change maintenance logs were recorded on the filter housings.

It was brought to Mr. Paul Lee's attention that vacuum pump condensate and contact water produced by mopping near the dry cleaning machine were to be treated as contact water. Vacuum pump condensate appeared to be discharged onto the floor of the boiler room.

Wastewater treatment equipment was not utilized on site. Mr. Lee explained that he had used a wastewater treatment unit in the past, but it was no longer on the premises.

The hazardous waste storage area was located behind the dry cleaning machine. One 15-gallon drum containing waste was properly sealed, but not stored within spill containment, was not labeled as hazardous waste, and was not dated with the accumulation start date (recommended). The other 15-gallon drum was empty. Hazardous waste labels were observed on the wall above the waste drum.

The spotting table was observed with a waste collection container. A small amount of accumulated waste was observed.

The Emergency Information Form (in case of a spill or other emergency) was provided to Mr. Paul Lee and he was instructed to complete and post this form close to the telephone. Absorbent spill clean-up materials were not available on site. Mr. Lee stated that he was instructed by Safety Kleen to use his shop vacuum to clean up any spills, and then dispose of the contents of his vacuum in the waste drum.

The following records were kept onsite and were readily available for review: perc purchase receipts (incomplete), machine operation manual, Material Safety Data Sheets (MSDS) for solvents/spotting agents, and waste manifests for pickup (incomplete). The following records were not readily available for review: all perc purchase receipts (from 2007), perc 12-month running total, Leak Detection and Repair log, receipts pertaining to equipment purchases, modifications and repairs, log of the condenser exit temperature, all manifests for waste pickup, and Hazardous Waste Inspection Log.

US 2.50 Cleaners had not received a DSCA Compliance calendar, and was provided a 2009 calendar. Mr. Lee was instructed to begin keeping all required weekly/monthly recordkeeping logs in the DSCA Calendar.

The facility had not been conducting monthly leak detection inspections of the dry cleaning equipment with a halogen leak detector, and will need to acquire a detector immediately.

(IV) CONCLUSIONS: US 2.50 Cleaners has received an outreach visit from the DSCA Compliance program in which the inspector reviewed all of the regulations that apply to the facility. An outreach corrective action letter, outlining all of the needed improvements required to ensure environmental compliance was sent by certified mail to Mr. Paul Lee, owner of US 2.50 Cleaners, on November 24, 2009.

(V) RECOMMENDATIONS: US 2.50 Cleaners is required to respond to DSCA compliance by December 16, 2009 as to what actions have been taken to address items 1-17 in the corrective action letter. If a response is received by DSCA then no further action is required. It is recommended that a DSCA compliance inspection be conducted by November 2010.

US \$2.50 Cleaners
7558 NC Hwy 73 #101
Denver NC 28037
(704) 827-8300

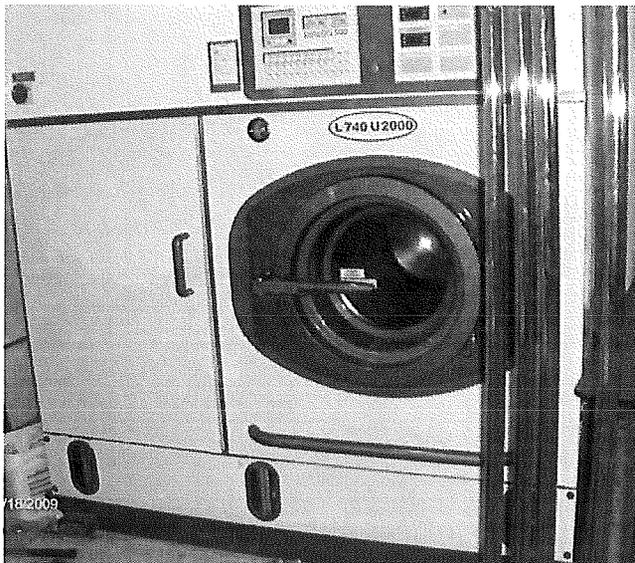
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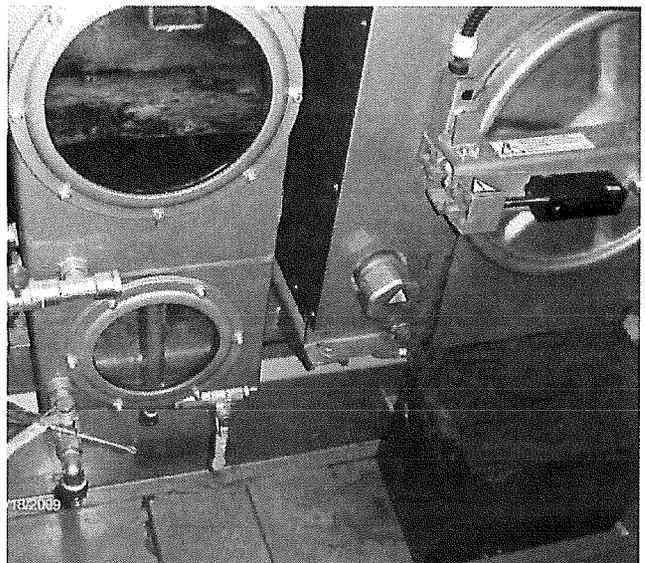
Picture 1: US \$2.50 Dry Cleaners located in the Pilot Knob Square Shopping center (Lincoln County).



Picture 2: Storefront of US \$2.50 Cleaners.



Picture 3: 4th Generation dry to Dry Union L740 U2000 (40 lb. capacity) dry cleaning machine with spill (secondary) containment around and underneath.



Picture 4: Back of dry cleaning machine. The machine had not been operated for dry cleaning since summer 2009.



Picture 5: Filter change maintenance logs recorded on the filter housings.



Picture 6: Spotting table with waste collection container. Small amount of accumulated waste observed.



Picture 7: Vacuum pump condensate appeared to be discharged onto the floor of the boiler room.



Picture 8: Hazardous waste storage area located behind the dry cleaning machine. One 15-gallon drum containing waste was properly sealed, but not stored within spill containment, not labeled as hazardous waste, and was not dated with the accumulation start date (recommended).

To: Mr. Paul Lee, Owner
US 2.50 Cleaners
7558 NC Hwy 73 #101
Denver, Lincoln County
North Carolina, 28037

From: Ms. Alicia Roh, Compliance Inspector
North Carolina Department of Environment and Natural Resources (NCDENR)
Division of Waste Management (DWM)
Dry-Cleaning Solvent Cleanup Act (DSCA) Program

Date: November 24, 2009

Please address the following issues at US 2.50 Cleaners, as discussed during our on-site meeting on November 18, 2009.

At no time shall any dry-cleaning solvent, wastes containing dry-cleaning solvent, or water containing dry-cleaning solvent be discharged onto land or into waters of the State, sanitary sewers, storm drains, floor drains, septic systems, boilers, or cooling-towers.

- 1) Install spill containment (secondary containment) under all hazardous waste storage areas. Spill containment pans must be capable of holding 110% of the capacity of the largest waste container, and be constructed of material that will retain its chemical and structural integrity in case of a spill or leak. *(Currently your waste drums are not stored within spill containment.)*
- 2) All hazardous waste drums containing any waste solvent and/or used filters must be labeled "Hazardous Waste." *(Currently your waste drums are not labeled as hazardous waste.)*
- 3) Currently you are considered a Conditionally Exempt Small Quantity Generator. *However, DSCA advises all cleaners subject to the hazardous waste requirements to label waste drums with both the accumulation start date (the date waste was initially added to the drum) and the end date (the date drum is sealed for waste pickup).*
- 4) Lint filter debris from the dry cleaning machine should be placed into a hazardous waste drum and sealed. *(This also includes all the contents of the shop vacuum if it is used to clean the lint filters or any other debris that has come in contact with perc vapors.)*
- 5) Complete the Emergency Information Form (in case of a spill or other emergency) and post this form close to the telephone.
- 6) Absorbent spill clean-up materials must be available on site for use to clean up any spills. *(Your solvent supplier or waste pickup company can advise you regarding the proper absorbent materials to use, instead of your shop vacuum.)*
- 7) Treat vacuum pump condensate as contact water. Immediately discontinue releasing untreated vacuum pump water (contact water) onto the floor of the boiler room. Begin collecting the vacuum pump condensate in a waste container and transfer to either a hazardous waste drum or treat on site utilizing a wastewater treatment unit (evaporator with a minimum of two carbon filters).
- 8) Periodically empty the spotting table waste and dispose in a hazardous waste drum.
- 9) Maintain on site receipts of manifests pertaining to waste pickup *(please keep these organized and in order from most recent to oldest)*. EPA regulations state these need to be on site for 3 years. *It is recommended that you log the hazardous waste pickup manifests in the "Hazardous Waste Manifest Log-for waste shipped off site" table at the back of the calendar.*
- 10) Maintain on site receipts for solvent purchases *(please keep these organized and in order from most recent to oldest)*. EPA regulations state these need to be on site for 5 years.

- 11) Maintain on site receipts pertaining to equipment purchases, modifications and repairs.
- 12) Begin immediately keeping all required (highlighted red) weekly/monthly recordkeeping logs found in the 2009 DSCA Compliance Calendar. *If you choose not to utilize the DSCA 2009 Compliance Calendar, your records must comply with all federal and state regulations. DSCA strongly recommends that you begin logging all required records in the 2009 DSCA Compliance Calendar.*
- 13) Begin calculating your 12-month rolling total of perc purchases monthly. Utilize the monthly table labeled "Solvent Purchases Running Total" in the 2009 DSCA Compliance Calendar.
- 14) Begin keeping a LDAR (Leak Detection and Repair log) that is labeled "Weekly NESHAP Inspection Log" in the 2009 DSCA Compliance Calendar.
- 15) Begin logging the condenser exit temperature once weekly at the end of the dry cycle. Utilize the "Weekly Condenser Temp Log" found in the 2009 DSCA Compliance Calendar. *Note: You may record the high and low pressure gauge readings on your refrigeration system in lieu of the condenser exit temperature, if your maintenance manual provides the high-low refrigeration system pressure range settings. Review your maintenance manual to determine the acceptable pressure range of both the high and low-pressure limits of your refrigeration system. Record the actual pressure reading of both the high and low pressure gauges (you may use the calendar temp log).*
- 16) Immediately begin conducting monthly leak detection inspections of your dry cleaning equipment with a halogen leak detector. This requirement is in addition to the Weekly NESHAP Inspections (LDARs). *DSCA recommends utilizing the halogen detector immediately for the weekly LDARs.*
- 17) DSCA advises that you contact your hazardous waste transporter or local municipal waste hauler to determine disposal acceptance requirements for mercury containing fluorescent bulbs. *Fluorescent light bulbs (which contain mercury) must be managed as any other hazardous waste including shipment to a recycler as hazardous waste or can be managed as universal waste if they are not crushed. Low mercury Fluorescent bulbs (green tips) can be shipped to a recycler as non-hazardous waste or to a municipal lined landfill if the landfill will accept them.*
- 18) Treat perc-contaminated mop water as contact water and treat or dispose properly as hazardous waste.

Note: Items 19-23 are only necessary if you choose to treat your contact water on site with a wastewater treatment unit (evaporator).

- 19) In the future, if you choose to utilize an onsite wastewater treatment unit (WWTU) instead of drumming contact/separator water as hazardous waste, DSCA strongly recommends the utilization of an evaporator unit rather than misting. *The evaporator unit should be equipped with a minimum of two carbon filters prior to evaporation to ensure that the contact water containing perc solvent is completely recovered and not released into the environment.*
- 20) In the future, when or if you utilize an on-site wastewater treatment unit, change your filters on your wastewater treatment unit as recommended by the manufacturer and dispose of the filters in the hazardous waste drums. *DSCA recommends at least a two month's supply of wastewater treatment unit filters to be available on site.*
- 21) In the future, when or if you utilize an on-site wastewater treatment unit, spill containment is required under all on-site waste treatment units.
- 22) In the future, when or if you utilize an on-site waste water treatment unit, begin keeping the "Onsite Waste Water Treatment Unit: (Evaporator/mister) Log" found in the 2009 DSCA Compliance Calendar once you install and operate the new onsite waste treatment unit.
- 23) In the future, when or if you utilize an on-site wastewater treatment unit, all invoices, maintenance and service records must be retained on site for three years.

Please thoroughly review the 2009 DSCA Compliance Calendar and immediately begin keeping the required records and documentation for your facility. Please also review the "Minimum Management Practice (MMPs)" compliance requirements and the "Letter of Introduction" as it lists items that compliance inspectors will need to review to determine environmental compliance at your dry cleaner facility.

Please submit a written response to the address below by December 16, 2009, as to the actions you have taken to address the above items 1-17.

Division of Waste Management
DSCA Compliance Program – Attn: Eric Swope
1646 Mail Service Center
Raleigh, North Carolina 27699-1646

We appreciate your immediate attention to these concerns. Thank you for your cooperation and assistance during the site visit on November 18, 2009.

Regards,
Alicia Roh

(919) 218-0015