

FACT SHEET

PROPOSED PERMIT MODIFICATION FINAL REMEDY DECISION

for

Trex Properties LLC
3114 Cullman Avenue
Charlotte, North Carolina 28206
EPA ID Number: NCD 049 773 245

A modified permit has been prepared for Trex Properties LLC (Trex) to conduct a final remedy under the Federal Resource Conservation and Recovery Act (RCRA). North Carolina has been authorized by the United States Environmental Protection Agency to administer RCRA including the Hazardous and Solid Waste Amendments (HSWA) of 1984. The proposed final remedy is documented in the Updated Conceptual Approach to Remediation dated May 15, 2016 and approved on October 14, 2016. The State has determined that Trex's proposed activities as identified in the application satisfies the full intent of the North Carolina Hazardous Waste Management Rules and Solid Waste Management Act as amended. When finalized this modified permit issued by the State of North Carolina will constitute a complete permit under the Federal Resource Conservation and Recovery Act.

Trex (formerly Detrex Corporation) operated a RCRA-permitted hazardous waste treatment and storage facility from 1983 until 2015. Trex accepted hazardous wastes for reclamation, blending and disposal from automobile repair shops, large volume manufacturers, and other clients generating waste from solvent and aqueous cleaning processes. Hazardous waste operations consisted of:

1. A distillation process unit for solvent recovery (recycling)
2. Five interior containment tanks
3. One external containment area for flammable wastes
4. A primary and secondary loading and unloading area
5. A primary and secondary staging area

Previous accidental spills of industrial solvents including trichloroethene (TCE), perchloroethene (PCE), 1,1-dichloroethene (DCE) and 1,1,1-trichloroethane (TCA) have been documented and investigated.

Two RCRA-permitted feed tanks were decommissioned and removed from service in 2007. The remaining RCRA-permitted storage areas and tanks were decontaminated and removed from service in 2016. The facility remains closed.

A Draft Phase III RCRA Facility Investigation Report was issued in 2015 and documented contaminants of concern in groundwater and soil at concentrations exceeding the North Carolina 15A NCAC 02L groundwater standards and EPA residential and industrial soil screening levels. A proposed final remedy corrective action was approved in 2016 and includes a soil vapor extraction (SVE) system; semi-annual indoor air sampling in two buildings adjacent to the site (one regularly occupied); and, chemical injection. The SVE system was installed in early 2017 and remains operational. Weekly reports documenting the SVE status are submitted to DEQ. A positive pressure ventilation system was installed in the occupied building. Semi-annual indoor air monitoring is ongoing but indicates that the SVE system is reducing the soil vapors that migrated off-site. Nineteen injection wells were installed in 2018 and persulfate injection was performed in January 2019. Pre- and post-injection groundwater samples

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will be collected to evaluate the effectiveness of the remedial activities.

It is anticipated that the combination of SVE and chemical injection shall lower contaminant concentrations. However, it is possible that additional remedial steps may be required in order to decrease contaminant concentrations below screening levels. Future remedial decisions shall be based on the ongoing groundwater analyses.

The North Carolina Hazardous Waste Management Rules require that the public be given a forty-five-day period to comment on the draft modified permit. This forty-five-day period will commence on Friday, March 15, 2019. The draft permit and all data submitted by the applicant is available as part of the administrative record at the <https://deq.nc.gov/about/divisions/waste-management/laserfiche>. Documents may be located using the EPA ID Number: NCD049773245.

A public hearing will be held at 1:00 pm on Tuesday, April 16, 2019 at the Sugar Creek Public Library, 4045 North Tryon Street, Suite A in Charlotte, North Carolina. All attendees will have the opportunity to present five-minute oral statements regarding the proposed permit modification and final remedy selection. Written comments may be submitted at the public hearing.

The public may also submit written comments at any time during the forty-five-day public comment period, which begins on Friday, March 15, 2019, and ends on Monday, April 29, 2019. Persons wishing to comment on the proposed permit modification and final remedy selection should submit comments to:

Ms. Julie S. Woosley, Chief
NC Division of Waste Management
Hazardous Waste Section
MSC 1646
Raleigh, NC 27699-1646

All comments received during the public comment period or at the public hearing will be considered in the final permit decision. Comments received after the public comment period end date will not be considered. When a final permit decision is made to either issue or deny the permit modification, notice will be given to the applicant and to each person who submitted written comments or requested notice of the final decision.

Anyone desiring additional information may contact Caroline Bari at (919) 707-8325, caroline.bari@ncdenr.gov or the address listed above.