United States Environmental Protection Agency
Region V
POLLUTION REPORT

Date: Friday, March 28, 2008
From: Tom Cook & Jaime Brown

Subject: Waste Categorization
Sparkle Dry Cleaners
1122 3rd Avenue, Rockford, IL
Latitude: 50.0600000
Longitude: -47.5800000

POLREP No.:	3	**Site #:**	B5MV
Reporting Period:	3/21/2008 to 3/28/2008	**D.O. #:**	
Start Date:	3/17/2008	**Response Authority:**	CERCLA
Mob Date:	3/17/2008	**Response Type:**	Time-Critical
Demob Date:	4/4/2008	**NPL Status:**	Non NPL
Completion Date:	4/4/2008	**Incident Category:**	Removal Action
CERCLIS ID #:		**Contract #**	
RCRIS ID #:			

Site Description

The Site is located at 1122 3rd Avenue in Rockford, Winnebago County, Illinois. The Site is an inactive and abandoned former dry cleaning facility consisting of a rectangular, two-story building. The Site is bordered by 2nd Avenue to the north, a hardware store to the east, 3rd Avenue to the south, and 7th Street to the west (Figure 2-1). The Meridian coordinates for the Site are 42º15'50.06" North and 89º04'47.58" West. The size of the Site was not found in background documents; however, an overhead image of the property suggests that the Site covers approximately 0.2 acre and that the Site's building occupies approximately 4,400 square feet. The Rock River is located approximately 0.75 mile northwest of the Site. The Site is in a mixed residential and commercial/industrial area. The nearest residents are located in an apartment complex approximately 100 feet northwest of the Site.

The Site operated from approximately 1948 to 2004 as a dry cleaning facility. In 1994, a Phase I Environmental Site Assessment (ESA) was conducted by Huff & Huff, Inc., of LaGrange, Illinois. During the ESA, three soil borings were collected and analyzed for volatile organic compounds (VOC) and total petroleum hydrocarbons (TPH). The specific TPH compound analyzed for was Stoddard Solvent, the dry cleaning solvent used during operations. One boring was advanced to a depth of six feet below ground surface (bgs) and two borings were advanced to a depth of 12 feet bgs. The boring advanced to six feet bgs was located near the dry cleaning units and soil in the boring contained VOCs at the following concentrations:

VOCs in Soil Boring near Dry Cleaning Units:
Sample Depth- 2 to 4 feet bgs
Detected VOCs:
Ethylbenzene – 0.006 mg/kg
TCE – 0.078 mg/kg
Toluene – 0.0093 mg/kg
Total Xylenes – 0.045 mg/kg
Sample Depth- 4 to 6 feet bgs
Detected VOCs:
TCE – 0.049 mg/kg
Total Xylenes – 0.021 mg/kg
TPH as Stoddard Solvent–20 mg/kg
bgs – below ground surface
mg/kg – milligrams per kilograms
TCE – tetrachloroethylene
TPH – total petroleum hydrocarbons
VOC – volatile organic compound

The other two borings were collected from a location near the Stoddard Solvent pump and aboveground

storage tank (AST) and from a location outside the building beneath the Stoddard Solvent fill pipe, respectively. These two borings contained no detections of VOCs or TPH.

In October and November 2007 Fehr-Graham & Associates, LLC, of Rockford, Illinois, performed a Phase I ESA on behalf of the City of Rockford. The ESA included a site reconnaissance that revealed the following conditions present at the site:
•All windows and doors were boarded up at the Site and there is no electricity. Therefore, it was fairly dark inside the building.
•The building's interior was cluttered by dry cleaning equipment, clothes, and general debris.
•There is an upper level in the building that consists of offices and a restroom. A leaking ceiling had caused the wooden structure of this upper floor to become very wet and moldy. In addition, the upper level was apparently vandalized and in disarray.
•A fill pipe for the AST inside the building was located on the west wall outside the building.
•Possible asbestos-containing material (ACM) floor tiles were observed.
•Three dry cleaning units were observed inside the building with the supply tank of one unit mostly full of dry cleaning product.
•An AST with a hand pump was observed near the west central wall and was inaccessible because it was covered with miscellaneous items.
•The historical boiler room was observed southeast of the AST.
•Several 55-gallon drums were observed on the ground floor of the building. The drums appeared to contain various chemicals, including spent TCE and petroleum-based dry cleaning products.
•Several small chemical storage containers (five gallons and less) were observed.

On December 20, 2007, WESTON START members Mr. Ben Maradkel, Mr. Jay Rauh, and Mr. Randy Livingston met with U.S. EPA OSC Cook; City of Rockford representative, Mr. Andy Laurent; and Mr. Jerry Willman of the Illinois Environmental Protection Agency to assess the Site's current conditions and conduct waste sampling. During the site reconnaissance, WESTON START provided written and photographic documentation of the Site conditions and performed continuous breathing zone air monitoring with a MultiRAE Plus five-gas monitor, and a Micro-R gamma radiation meter. No air monitoring readings above background levels were recorded for the breathing zone throughout the Site during site reconnaissance.

The Site building was in fair condition and all the windows and doors were boarded. Site access is unrestricted and it appeared that trespassing had occurred at the site because debris was scattered in a haphazard way throughout the building.. There were some leaks in the roof, and miscellaneous containers and debris were scattered throughout the building. The drop ceiling in the building was deteriorating and falling down due to water leakage from the roof. Items and debris were scattered throughout the building. The first floor of the building contained some distinct areas including a Sorting Area, Dry Cleaning Area, Boiler Room, Storage Area 1, and Storage Area 2. An AST was located northwest of the Dry Cleaning Area. A second floor in the building contained offices. Suspect ACM was present throughout the building. Building material that could possibly be ACM included floor tile, plaster, drywall, window caulking, and fiberglass paper backing. The following is an inventory of the containers observed throughout the building:
•12 to 14 drums suspected to contain chlorinated solvents including PCE located throughout the first floor of the building
•20 to 25 small containers (one-gallon to five-gallons) containing corrosives, flammables, paints, strippers, thinners, and chlorinated solvents located throughout the first floor of the building
•One AST (approximately 1,000 gallons) with approximately one inch of product remaining located in a separate room northwest of the dry cleaning area on the first floor of the building
•One 150-gallon vat (located underneath the washing machine) that was half full located in the dry cleaning area

Current Activities

During this reporting period, waste consolidation and clean-up activities were carried out. On March 24, 2008, START and ER personnel returned to the Site, which was secured over the weekend, to continue work. The large dry cleaning machine located above Vat 1, on the opposite wall from the building's west door, required emptying. Around 100 gallons of liquid waste was located inside Vat 1, and a removal strategy was implemented. Before pumping-out the flammable liquid waste, the Drum-Vac was both grounded and bonded to minimize the build-up of a static electric spark, thus eliminating an ignition source. ER personnel donned Level C protective gear while performing the pumping work. Attached to the same machine, 16 carbon filters remained from previous dry cleaning activities. ER personnel removed and drummed these filters and included them in the Site's waste profile. At the end of the day, four additional 55 gallon drums were added to the Site's collection of waste.

Work on March 25th began inside the Storage Area 1 Room. The ceiling-mounted metal clothes rack

was removed along with some low-hanging foam ceiling tiles to minimize overhead hazards. The floor of the room was then decontaminated with soap and water and allowed to air dry. Outside of the Storage Area 1 Room additional debris/trash and a tool cart were found behind a hot water heater . This mobile tool cart contained approximately a dozen tools that were covered in an oily waste. ER personnel cleaned all these tools with absorbent pads and towels. Some gas cans and five gallon buckets were also tasked for removal. START checked the levels, specifically the low explosive limit, of all the cans and buckets and determined that they were safe to tear-apart. ER personnel utilized the Bobcat and a saws-all to render the containers useless before placing them in the roll-off-box to complete work on Site for the day.

On March 26th debris/trash removal continued with the emptying of the building's north upper level room. ER personnel began the day by cutting apart some empty five gallon buckets and opened two filter pots found in the garage area. The filter pots were connected to dry cleaning machine waste outputs. Only small quantities of water were found inside both pots and no additional waste removal was required. The north room of the building's upper level was then targeted for clean-up. ER personnel partially filled large plastic bags with old paperwork and envelopes. These bags placed inside the roll-off-box for disposal. At the end of the work day, the upper level north room was almost completely emptied and the roll-off-box was covered with poly-sheeting and secured with zip-ties and duct tape.

The main work task on March 27th was removal of filter piping and trapped liquid waste. The large dry cleaning machine located above Vat 1, housed a filter system with previously removed carbon filters. Each filter pod held two identical carbon filters interconnected with piping. ER personnel, in Level C protective gear, utilized a saws-all to cut away sections of the piping in stages. Five-gallon buckets were placed under and around the piping network to collect residual liquid waste left inside the piping. This waste, approximately two gallons, was then combined with the liquid previously taken from Vat 1. After all the piping and pods were removed, ER personnel cleaned the area with soap and water. Three mercury switches found on-site were packaged for shipping also.

On March 28th waste drums were labeled and prepped for transport. All existing markings/labels were removed or blacked-out with paint by ER personnel. Proper shipping markings and DOT shipping labels were affixed to each drum. ER personnel also worked to collected and remove some of the building's original asbestos containing floor tiles The tiles were double bagged in plastic, sealed with duct tape, and placed in the roll-off-box.

SAMPLING ACTIVITIES

No sampling activities were completed by ERRS or START during this reporting period.

Planned Removal Actions

•Continued debris/trash removal from the building's ground and upper floor into roll-off boxes;
•Hazardous waste bulk container removal and proper disposal.

Next Steps

•Obtain final waste stream(s) approval;
•Hazardous waste bulk container removal and proper disposal;
•Site final clean-up and demobilization.

Key Issues

•Maintaining documentation of removal activities; and
•Correct waste stream categorization for proper hazardous waste removal and disposal.