

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At
Artistic Cleaners
109 Locust Street
Dubuque, Iowa 52001
(563) 583-3544

EPA ID Number: IA0000140822

On
May 17, 2022

By
U.S. ENVIRONMENTAL PROTECTION AGENCY
Region 7
Enforcement and Compliance Assurance Division (ECAD)

1.0 INTRODUCTION

At the request of the Enforcement and Compliance Assurance Division, I conducted a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) at Artistic Cleaners (Artistic) located in Dubuque, Iowa, on May 17, 2022. The CEI was conducted under the authority of Section 3007(a) of RCRA, as amended. The facility was most recently inspected for RCRA compliance on May 20, 1997. Findings documented during that inspection are listed in Section 5, Summary, of this report. During this inspection, I collected the information and data necessary to determine compliance with the applicable regulatory and statutory requirements. The inspection report and attachments present the results of the CEI.

2.0 PARTICIPANTS

Artistic:

Victor J. "Gus" Helling, Owner, approximately 50 years with the company.
Doug Helling, Shop Foreman, approximately 30 years with the company.

U.S. Environmental Protection Agency (EPA):

H. D. "Doug" Bryant, CPP, PCI, Civil Investigator, NOWCC/SEE, ECAD/Chemical Branch/RCRA Section.

3.0 INSPECTION PROCEDURES

Prior to beginning the inspection, I conducted a visual reconnaissance of Artistic on May 17,

2022, searching for areas of concern observable from the adjacent street. No environmental issues or areas of concern were observed during this preliminary examination.

I arrived unannounced at Artistic at approximately 0830 hours, May 17, 2022. I parked outside the facility in a customer parking lot. I entered the business lobby which featured a counter where clothing could be placed for cleaning services. I was greeted by an employee, and I asked to see Mr. Helling, identified as the site contact. The employee summoned Mr. "Gus" Helling to the front counter area. I identified myself and presented my EPA Credentials and explained the purpose of my visit. Mr. Helling invited me into the business and took me to his office that was used throughout the remainder of the CEI. For clarity, any references to Mr. Helling in this report assumes that the individual is Mr. "Gus" Helling, unless noted.

I started my entrance briefing after we moved to Mr. Helling's office. We exchanged business cards (Attachment 1). I next presented Mr. Helling a copy of RCRA section 3007(a), which provides inspection authority. I explained my need to collect accurate information and presented him a copy of Title 18 U.S. Code, Sections 1001 and 1002. He was made aware of his confidentiality rights and was informed that a Confidentiality Notice would be provided at the end of the inspection to make or not to make any claims. Mr. Helling acted as the official facility representative throughout this inspection.

The inspection consisted of an entry briefing, a discussion of facility operations, waste generation and waste management, a review of waste management records, and a visual inspection of the waste generation and management areas. An overhead photo image of the facility is attached (Attachment 2).

Document photocopies and five photographs were collected as inspection documentation (Attachments 1-7). Information collected during the CEI was recorded on a checklist and in field notes. I followed the inspection procedures discussed in the RCRA Compliance Evaluation Inspection Standard Operating Procedure (No. 2321.1C), unless noted differently.

At the conclusion of the inspection, I conducted an exit briefing, during which I summarized my findings and recommendations with Mr. Helling. I provided Mr. Helling a *Confidentiality Notice*, which he signed, indicating no confidentiality claims were made by the facility (see Attachment 3). I did not collect any documents or samples. I provided Mr. Helling a *Notice of Preliminary Findings* which he signed acknowledging receipt (Attachment 4).

The following inspection documents and compliance assistance handouts were left with the facility:

Section 3007 Inspections Sheet (EPA Handout)

RCRA Facility Access Information Sheet (EPA Handout)

United States Code Annotated (EPA Handout)

Notice Regarding Proprietary/Confidential Business Information Submitted to or Collected by EPA in Connection with Inspections (EPA Handout)

Notice of Preliminary Findings (EPA Handout)

Instructions for Responding to a Notice of Preliminary Findings (NOPF) (Reverse of NOPF)
U.S. EPA Small Business Resource Information Sheet (EPA Handout)
Solvent-Contaminated Wipes Final Rule Chart (EPA Handout)
Excluded Solvent-Contaminated Wipe Rule (IDNR Handout)
Battery Recycling/Disposal (IDNR Handout)
Universal Wastes Including Aerosol Cans (IDNR Handout)
Environmental Compliance Assistance Centers (EPA Handout)
e-Manifest Fact Sheet (EPA Handout)
RCRA Online A Quick Reference Guide (EPA Handout)
Emergency Response Program (EPA Handout)
Security Awareness (EPA Handout)
Managing Your Hazardous Waste: A Guide for Small Business (EPA Handout)

4.0 FINDINGS AND OBSERVATIONS

4.1 Facility Information and Operations

This facility is located in downtown Dubuque, Iowa, in a single-story building on Locust Street. The building, approximately 34 feet by 110 feet, houses a customer reception area, offices, and the dry-cleaning plant. The business has been at this location since 1975 and has 10 employees working 06:30-17:30 Monday through Thursday, and 06:30-13:30 Fridays. The North American Industry Classification System (NAICS) codes for this facility is 812320 – Drycleaning and Laundry Services (except coin-operated).

Artistic provides dry cleaning and laundry services for walk-in customers and commercial business accounts. Mr. Helling stated that business declined dramatically during the recent pandemic, reducing more than two-thirds in business volume. Mr. Helling stated that Artistic currently operates one 40-pound Fiber Matic perchloroethylene (Perc) dry cleaning washer, two 50-pound commercial laundry washers, two 30-pound commercial laundry washers, and two conventional “home-style” laundry washers. He added that a non-operational 50-pound Fiber Matic hydrocarbon dry cleaning washer is also located on site. This dry-cleaning washer has been inoperable for “six months or so” according to Mr. Helling. He added that it needs a new compressor unit that is “fairly expensive”, and the current business load has not yet justified the potential expense of returning the washer to duty. Perchloroethylene is used exclusively as a dry-cleaning agent in the operational 40-pound Fiber Matic Perc washer and various commercial spotters and detergents are used for laundry operations.

Mr. Helling stated that Artistic operates the 40-pound Fiber Matic perc washer “almost continuously” throughout business hours, Monday through Friday. He estimated that about 10 loads (400 pounds) of dry-cleaning clothes are cleaned daily. The dry-cleaning machine recovers spent Perc through an in-line distillation process. The machine also filters the Perc to maintain the quality of the Perc solvent. The resultant sludge (“still bottoms”) is removed from the machine weekly. Mr. Doug Helling stated that Artistic generates approximately one gallon of still bottoms weekly. He added that Artistic generates one filter, weighing approximately seven pounds, every two- and one-half months. Mr. Helling stated that Artistic generates process wastewater from

laundry operations that is discharged through the sanitary sewer system to the City of Dubuque Water Department, 50 W. 13th Street, Dubuque, Iowa. Mr. Helling estimated that Artistic generates “less than 300 gallons” of process wastewater daily. He added that the detergents and “spotters” used by Artistic are commercial products that are non-RCRA hazardous, by virtue of product and process knowledge.

4.2 RCRA Status

The facility Notification Acknowledgement/Verification Report identifies the facility as a small quantity generator (SQG) of D001, D007, D039, and D040 HW. However, shipping manifests document management of F002 listed HW as well. Therefore, I updated the Notification Acknowledgement/Verification Report (Attachment 5) accordingly. Mr. Helling stated that the facility upgraded fluorescent lighting fixtures approximately eight years ago and generates spent four-foot fluorescent lamps that were described as “environmentally friendly” by the vendor. He added that he is currently evaluating conversion to light emitting diode (LED) fixtures in the future. I determined that the facility generates less than 100 kg of HW monthly and therefore inspected Artistic as a VSQG of HW and a small quantity handler (SQH) of universal waste (UW). The facility does not generate any used oil.

4.3 Facility Waste Streams and Management

Artistic receives HW management support from Safety-Kleen Systems, Inc.(Safety-Kleen), 3035 W. 73rd Street, Davenport, Iowa. HW shipments are picked up and transported off-site by Safety-Kleen (EPA ID# TXR000081205). Documented HW shipments were transported to Clean Harbors Recycling Services of Ohio, LLC (Clean Harbors), (EPA ID# OHD980587364), 581 Milliken Drive, Hebron, Ohio, for solvents recovery.

The following waste streams are managed by Artistic:

General Trash: Mr. Helling stated that Artistic generates approximately one nine-cubic yard roll-off container of general trash weekly. The general trash consists of waste office paper, lunch wastes, and miscellaneous cardboard and packing materials. Mr. Helling stated that the general trash has been determined to be non-RCRA hazardous, by virtue of product and process knowledge. The general trash is picked up weekly by Republic Services of Dubuque (Republic), 15034 Depot Ridge, Peosta, Iowa, and transported off-site to the Dubuque Metropolitan Area Solid Waste authority for sanitary landfill disposal at 14501 Highway 20 W, Dubuque, Iowa.

Waste Perc Sludge: Mr. Doug Helling stated that Artistic generates approximately one gallon of distillation sludge “still bottoms” weekly. The waste Perc sludge is managed as D001, D007, D039, and D040 characteristic HW and is profiled as NA 1993, Waste Combustible Liquid. The safety data sheet (SDS) for Perc is attached (Attachment 6). The waste Perc sludge is collected in a 15-gallon drum located behind the dry-cleaning washers.

Waste Perc Filters: Mr. Doug Helling stated that Artistic generates approximately one waste Perc filter every two-and-one-half-month. The waste Perc filter weighs approximately seven pounds and is placed into a 15-gallon drum. The waste Perc filter is managed as D001, D007, D039, D040 characteristic and F002 listed HW, profiled as UN 2810 Waste Toxic Liquid, Organic, Tetrachloroethylene). The waste Perc filter drum is located behind the dry-cleaning washers. The waste Perc filters are picked up and transported off-site by Safety-Kleen and transported to Clean Harbors for solvent recovery.

Process Wastewater: Mr. Helling stated that the process wastewater generated by Artistic has been determined to be non-RCRA hazardous, by virtue of product and process knowledge. As previously stated, Artistic generates approximately 300 gallons of process wastewater daily, Monday through Friday. The process wastewater is discharged through the sanitary sewer system to the City of Dubuque publicly owned treatment works (POTW).

Waste Aerosol Cans: Mr. Helling stated that Artistic generates approximately one RCRA-empty waste aerosol cans every three to six months. The waste aerosol cans include glass cleaner and similar commercial cleaning products. The empty waste aerosol cans are currently disposed in the general trash. Mr. Helling expressed interest in learning more about managing waste aerosol cans as universal waste (UW), which was addressed as compliance assistance during our exit briefing.

Spent Fluorescent Lamps: Mr. Helling stated that Artistic generates between 24-36 spent four-foot fluorescent lamps annually. I asked Messrs. Helling the disposition of the spent fluorescent lamps, to which Mr. Doug Helling responded that the fluorescent lamps are disposed in the general trash. I asked Messrs. Helling if Artistic had conducted a HW determination on the spent fluorescent lamps, to which they responded that they understood that the spent lamps were “environmentally friendly” based upon information provided by their vendor and had NOT specifically conducted a HW determination on the spent lamps. **Artistic must conduct a HW determination on the spent fluorescent lamps generated in the facility and disposed in the general trash in accordance with the provisions of 40 CFR §262.11 (NOPF No. 1.)**

4.4 Visual Inspection of Facility Waste Stream Management

A visual inspection of the facility was conducted to observe waste stream management practices and document regulatory compliance. Photographs, checklists, and field notes were used to document observations made during the visual inspection. A Photo Log was created, and photos taken during the inspection appear in Attachment 7.

I observed one 40-gallon Fiber Matic dry-cleaning washer (Photos 1 and 2). The washer was in continuous use throughout my inspection.

I observed one closed, full, labeled 15-gallon container of waste Perc sludge located behind the dry-cleaning washer (Photo 3). I observed one 15-gallon container, approximately eight inches full of Perc sludge, shown in Photo 4. Mr. Doug Helling stated that there were no waste Perc

filters on-site at this time.

No other environmental issues or areas of concern were observed during this visual examination.

4.5 Documentation

During my visual inspection of the facility, I reviewed a dry-cleaning washing machine weekly leak inspection log (Photo 5).

Prior to this CEI, I reviewed six electronic uniform hazardous waste manifests (UHW) for HW generated by this facility, spanning the period of April 26, 2019, to present, shown below:

UHW#	DATE	Description	QTY	Unit	EPA Waste Codes
006786336SKS	1/2/2019	UN2810, Waste Toxic Liquid	3	DM	D007, D039, D040, F002
		NA1993, Waste Combustible Liquid, Petroleum Naphtha	1	DM	D001, D007, D039, D040
007083029SKS	6/20/2019	UN2810, Waste Toxic Liquid	1	DM	D007, D039, D040, F002
		NA1993, Waste Combustible Liquid, Petroleum Naphtha	2	DM	D001, D007, D039, D040
		NA1993, Waste Combustible Liquid, Filters, Liquid	1	DM	D001, D007, D039, D040
007353953SKS	1/17/2020	NA1993, Waste Combustible Liquid, Petroleum Naphtha	2	DM	D001, D007, D039, D040
007282259SKS	3/5/2020	NA1993, Waste Combustible Liquid, Petroleum Naphtha	4	DM	D001, D007, D039, D040
008028398SKS	8/2/2021	NA1993, Waste Combustible Liquid, Petroleum Naphtha	3	DM	D001, D007, D039, D040
		NA1993, Waste Combustible Liquid, Filters, Liquid	4	DM	D001, D007, D039, D040

5.0 SUMMARY

The following findings were documented during the previous RCRA CEI conducted on May 20, 1997, when the facility was operating as a small quantity generator (SQG) of HW:

NOPF No. 1: 40 CFR §262.42(b): Failure to submit an exception report within 60 days.

NOPF No. 2: 40 CFR §262.34 and 365: Failure to keep a container of hazardous waste closed.

NOPF No. 3: 40 CFR §262.34(a)(2): Failure to date a hazardous waste container.

I documented the following preliminary finding during this CEI:

NOPF No. 1: 40 CFR §262.11: Conduct a hazardous waste (HW) determination on the spent fluorescent lamps disposed in the general trash.

Other than the items specifically noted in this narrative, I observed no additional issues or potential findings. However, further EPA review may change or add to my findings.

HURLEY BRYANT
(Affiliate)

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BRYANT (Affiliate)
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Date: 6/1/2022

H. D. "Doug" Bryant, CPP, PCI
Civil Investigator, SEE

AMBER WHISNANT

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Date: _____

Amber Whisnant
Chief, RCRA Section, Chemical Branch
Enforcement and Compliance Assurance Division

Attachments:

- 1) Business Card (1 page)
- 2) Overhead Photo Image (1 page)
- 3) Confidentiality Notice (1 page)
- 4) Notice of Preliminary Findings (1 page)
- 5) Notification Acknowledgement/Verification Report (1 page)
- 6) Safety Data Sheet (SDS), DOWPER™ Solvent (12 pages)
- 7) Photo log (1 page) and Photos (5 pages)