



United States Environmental Protection Agency
Region 7
Enforcement and Compliance Assurance Division

Air Branch

Air Branch Inspection Report
Unannounced Full Compliance Evaluation
Metro Express Cleaners and Laundry
122 South Ankeny Boulevard
Ankeny, Iowa 50023
FRS# 110002084486

Inspection Date(s):
November 17, 2022

Sean Bergin, Inspector, ECAD, Air Branch

SEAN BERGIN

Digitally signed by SEAN
BERGIN
Date: 2023.03.07 11:08:46
-06'00'

Authorized for Release by:

Tracey Casburn, Air Branch Chief, ECAD

**TRACEY
CASBURN**

Digitally signed by
TRACEY CASBURN
Date: 2023.03.07
12:02:00 -06'00'

11201 Renner Boulevard
Lenexa, Kansas 66219

CONTENTS

INSPECTION OVERVIEW	3
INSEPCION OBJECTIVE	3
FACILITY CONTACT INFORMATION	3
FACILITY OVERVIEW	3
FACILITY OPERATIONS SUMMARY	4
FIELD ACTIVITIES SUMMARY.....	4
Measurement and/or Sampling Activities.....	5
INSPECTION OBSERVATIONS AND POTENTIAL FINDINGS.....	5

TABLES

Table 1. PROJECT TEAM MEMBERS	3
Table 2. FACILITY CONTACT INFORMATION	3
Table 3. APPLICABLE REGULATIONS AND STANDARDS	3
Table 4. FIELD MEASUREMENT ACTIVITIES	5

APPENDICES

- A Request for Documents Response (79 of pages)
- B Field Photographs (21 pages)

**This Contents page shows all the sections contained in this report
and provides a clear indication of the end of this report.**

INSPECTION OVERVIEW

INSPECTION OBJECTIVE

The objective of the full compliance evaluation (FCE) inspection was to determine compliance of the facility with the Clean Air Act, Section 111, New Source Performance Standards (NSPS), and Section 112, Hazardous Air Pollutants, and implementing regulations in the code of federal regulations (CFR). The inspection was part of the U.S. Environmental Protection Agency's (EPA) Creating Cleaner Air for Communities National Enforcement and Compliance Initiative. The inspection was prompted by a request from the EPA Region 7 Superfund Division after a representative of the Division observed a drum of perchloroethylene at the site of the inspection.

Table 1 lists the inspection team members.

Table 1. PROJECT TEAM MEMBERS		
Team Member	Organization	Project Role
Sean Bergin	EPA, Region 7, ECAD, Air Branch	Lead Inspector
Jim Voight	Polk County Air Quality Division, Iowa Department of Natural Resources (IDNR)	Inspector

FACILITY CONTACT INFORMATION

Table 2 lists the primary facility contacts.

Table 2. FACILITY CONTACT INFORMATION		
Name, Title	Phone No.	Email Address
Keith MacKay, Owner	(515) 963-9522	keith@reliablemaintenancecompany.com
Amber Edwards, Manager	(515) 963-9522	

FACILITY OVERVIEW

Metro Express operates under a conditional Operating Permit issued by the Polk County Air Quality Division January 6, 2022. Conditional operating permits are issued annually. The facility is permitted as a perchloroethylene dry cleaning area source. There have not been violations in the most recent five years. The facility is subject to the following regulations and standards (**Table 3**):

Table 3. APPLICABLE REGULATIONS AND STANDARDS	
Code of Federal Regulation	Standard Name
40 CFR Part 60	Subpart A, General Provisions and Subpart JJJ, Standards of Performance for Petroleum Dry Cleaners.
40 CFR Part 63	Subpart A, General Provisions and Subpart M, National Perchloroethylene Air Emission Standards for Dry Cleaning Facilities.

According to 40 CFR 60 Subpart JJJ the facility is required to maintain a record of the performance test. 40 CFR 63 Subpart M requires affected facilities to maintain records of all

maintenance, repair, inspections, monitoring, perchloroethylene purchases and consumption, design specifications and operating manuals of the dry-cleaning machine for 5 years.

FACILITY OPERATIONS SUMMARY

Metro Express operates a laundry and dry-cleaning service. The facility operates one perchloroethylene dry cleaning machine- a dry-to-dry machine with a refrigerated condenser.

The site began business operations in 1963 as Reynolds Max Trucking. Camelot Dry Cleaners operated at the site from 1979 to 1996, and Ankeny Dry Cleaners was associated with the property after 2000. Metro Express Dry Cleaning is currently operating at the site. In 2002 the property lessee, Mr. Keith MacKay, contracted Allendar Butzke Engineers Inc. to perform an environmental exploration of the property. Groundwater samples showed that perchloroethylene, trichloroethylene, cis-1,2-dichloroethylene, and vinyl chloride were above IDNR action levels. Annual IDNR sampling events have occurred on the site since 2006. The EPA is at the site to further delineate migration of VOC contamination in soil and groundwater, and to conduct vapor sampling to assess possible vapor intrusion at the site.

FIELD ACTIVITIES SUMMARY

I arrived at the facility on November 17, 2022, and completed a drive by surveillance inspection. Mr. Voight arrived a short time later and we made entry of the facility at 10:40 a.m. and were greeted by Ms. Edwards, facility manager. I introduced myself and Mr. Voight, presented my credentials, and provided my business card to Ms. Edwards. Ms. Edwards informed me that the owner was out of town. I conducted a brief opening conference during which I explained that the purpose of the visit was to conduct an inspection to determine compliance with the CAA. Specifically, to determine compliance with the conditions listed in Table 3. Ms. Edwards called Mr. MacKay and told him of our arrival. She confirmed to Mr. MacKay that we had leak detecting equipment with us and concluded their call. She told me that Mr. MacKay said to look at whatever we needed to look at. I asked Ms. Edwards if she knew anything about the dry-cleaning equipment or monitoring of the equipment. She explained that she did not. I asked Ms. Edwards if she had any knowledge of leak testing and repair of the dry-cleaning machine or where the records were kept. Ms. Edwards said that she did not. She said that Mr. MacKay is the only one that uses the equipment, and he operates the dry-cleaning machine at night. I requested Mr. MacKay's email address and asked Ms. Edwards to tell Mr. MacKay that I will be sending him an email or letter with a list of questions about the equipment, equipment monitoring, and required records.

Mr Voight and I examined the dry-cleaning machine and took photographs. For the duration of the inspection, I carried a Honeywell ppbRAE 3000+ photoionization device (PID) with a 10.6 eV lamp calibrated with isobutylene (calibration information is noted in the instrument log book). The PID was bump tested just prior to the entering the facility. Site sampling activities are described in the Measurement and/or Sampling Activities section below.

I did not conduct a closing conference with Ms. Edwards. No documents were collected during the inspection and a Receipt for Documents was not prepared. A Confidential Business Information form was not provided at the time of the inspection. At the close of the inspection Mr. Voight and I thanked Ms. Edwards for her time and exited the facility at approximately 11:30 a.m.

I sent an information request letter to Mr. MacKay on January 9, 2023, to collect monitoring records and information about the equipment and facility. I received the response on February 8, 2023 (Appendix A).

Measurement and/or Sampling Activities

I conducted sampling for volatile organic chemicals (VOCs) during the onsite inspection. The PID was operating when I entered to site and was used in and around the dry-cleaning machine. The PID was turned off after I exited the facility. After the inspection I was unable to download any data collected during the inspection from the PID. During the inspection I observed the PID many times and the highest observed reading was approximately 7.0 ppm VOCs found at approximately 10:55 a.m. while I was taking readings at the back of the dry-cleaning machine near the Still.

Table 4 summarizes field measurement and field sampling activities.

All environmental measurement activities were performed in accordance with the EPA Region 7 quality system.

Table 4. FIELD MEASUREMENT ACTIVITIES			
Location Identifier	Date(s) and Time	Method and/or Procedure ¹ , and Equipment	Measurer Name
Dry Cleaning Machine	11/17/2022 10:45 to 11:30	Region 7 procedure: <i>Safety and Sample Screening Instruments.</i> Instrument guide(s): Equipment: Honeywell ppbRAE 3000+, Serial No. 594-916195	Sean Bergin
1 The current version of each procedure, at the time of the investigation, was followed.			

INSPECTION OBSERVATIONS AND POTENTIAL FINDINGS

Ambient weather, site conditions and activities were documented in field records. All photographs are attached as Appendix B.

These observations are not final compliance determinations. The EPA Region 7 Air Branch case review team will make the final compliance determinations based on its review of this report and other technical, regulatory, and facility information.

No potential findings were identified at the time of the inspection.