

US EPA ARCHIVE DOCUMENT

## Clark County Dry Cleaner Self-Certification Inspection Checklist

### 1. Perc Purchases

1.1 Do you calculate the rolling twelve month total of Perc consumption on the first business day of each month and record this on your Hazardous Waste Calendar or Monthly Machine Maintenance and Perchloroethylene Log?	Yes	No	
1.2 Are Perc purchasing receipts recorded on the monthly machine maintenance log?	Yes	No	
1.3 Did you record the volume of Perc (solvent usage), each time it was added to the machine? Every time Perc (solvent) is added to the machine, you should record the volume on a log. This number is useful in calculating the efficiency of the machine or pounds of clothes per gallon of Perc.	Yes	No	

### 2. Equipment

2.1 Is the equipment operations manual stored onsite?	Yes	No	
2.2 Does the manual contain equipment design specifications?	Yes	No	
2.3 Does the manual contain Standard Operating Procedures?	Yes	No	
2.4 Is the machine operated according to manufacturers' specifications?	Yes	No	
2.5 Were all the dry-to-dry machines installed before 12/9/91 AND did facility purchase less than 140 gallons of Perc per year during all previous 12-month periods? 1 (If Yes - Skip to 2.11 existing small area source.)	Yes	No	
<b>Small and Large Dry-to-Dry Machine Control Requirements</b>			
2.6 Do all dry-to-dry machines installed before 12/9/91 have an external refrigerated condenser OR a carbon adsorber (a separate piece of equipment added to the machine) that was installed prior to 9/22/93? 2 (Choose N/A if machine installed after 12/9/91) (existing large area source).	Yes	No	N/A
2.7 Do all dry-to-dry machines installed after 12/9/91 have an internal refrigerated condenser (condenser coil that is built into the machine)? 3 (Choose N/A if machine installed before 12/9/91) (new area source).	Yes	No	N/A
<ol style="list-style-type: none"> <li>1. If machine was installed before 12/09/91 and you purchased less than 140 gallons of Perc per year for all 12-month periods, you are considered an existing small area source and not required to have control on the machine.</li> <li>2. If machine was installed before 12/09/91 and you purchased more than 140 gallons of Perc per year for all 12-month periods, you are considered an existing large area.</li> <li>3. If machine was installed after 12/09/91 you are considered a new area source.</li> </ol>			
2.8 Do all dry-to-dry machines initially installed after 12/21/05 have an internal carbon adsorber? (Choose N/A if machine installed before 12/21/05). This carbon adsorber is part of the machine.	Yes	No	N/A
2.9 Do all dry-to-dry machines initially installed after 12/21/05 have a refrigerated condenser? (Choose N/A if machine installed before 12/21/05). The condensing coil is part of the machine.	Yes	No	N/A
2.10 If machine was installed after 12/21/05 OR facility purchased more than 2,100 gallons of Perc per 12-month period, is the concentration of the Perc in the dry cleaning machine drum at the end of the cycle measured weekly with a colorimetric detector tube or PCE gas analyzer? (Choose N/A if machine installed before 12/21/05 and purchased less than 2,100 gal Perc/12-month period)	Yes	No	N/A
2.11 There have not been any changes to machines including additions, removals or modifications.	Yes	No	
2.12 MODIFICATION OF EQUIPMENT: There were no modifications, repairs	Yes	No	

or adjustments made to the equipment.			
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### 3. Operations and Maintenance

3.1 Is the dry cleaning machine door kept closed, except for loading and unloading?	Yes	No	
3.2 Are all cartridge filters drained 24 hours before removal?	Yes	No	
3.3 Was maintenance performed on the vapor collection and control system as specified in the equipment manual?	Yes	No	
Does the business complete a daily/weekly check list for the following:			
3.4 Was daily leak detection conducted as required by the Clark County Air Permit?	Yes	No	
3.5 Is the daily information recorded on a weekly maintenance log?	Yes	No	
3.6 Did you record other operation or maintenance information, i.e., the date the part(s) was ordered and received?	Yes	No	
3.7 Did you record the volume of chemicals and other supplies used DAILY?	Yes	No	
3.8 Did you record the monthly fuel (natural gas) usage or products consumed?	Yes	No	
3.9 Does the machine have a refrigerated condenser?	Yes	No	
3.10 Is the machine equipped with refrigeration system pressure gauges?	Yes	No Skip to 3.13	
3.11 Are the high and low pressures of the refrigeration system read and recorded on a weekly basis? (Choose N/A if no pressure gauges and skip to 3.13)	Yes	No	N/A
3.12 Are the pressures within those specified by the manufacturer? (Choose N/A if no pressure gauges)	Yes	No	N/A
3.13 Is the outlet temperature less than 45 degrees F?	Yes	No	
3.14 Is the temperature difference of the intake air and exit air greater than or equal to 20 degrees F?	Yes	No	
3.15 Is the date, temperature sensor or pressure gauge monitoring results recorded weekly?	Yes	No	
Did you answer yes to question 2.6?	Yes	Skip to 3.20	
3.16 Does the machine have a carbon adsorber?	Yes	No	
3.17 Is the carbon desorption process performed weekly?	Yes	No	
3.18 Is the concentration of Perc in the exhaust measured and recorded weekly?	Yes	No	
3.19 Is the Perc concentration in the exhaust from the carbon adsorber less than 100 parts per million (ppm)?	Yes	No	
3.20 Is the machine inspected monthly while in operation with a halogenated hydrocarbon detector or PCE gas analyzer?	Yes	No	
3.21 Did the facility purchase more than 2,100 gallons of Perc in a 12-month period?	Yes	No, Skip to 3.23	
3.22 Is a PCE gas analyzer used for monthly leak detection?	Yes	No	
3.22-A. For equipment that passes exhaust through the carbon adsorber immediately upon the machine door opening; Is the concentration of Perc in	Yes	No	N/A

the exhaust equal to or less than 100 ppm?			
3.22-B For equipment that passes exhaust through a carbon adsorber prior to the machine door opening; Is the concentration of Perc in the exhaust equal to or less than 300 ppm?	Yes	No	N/A
3.23 Did you record the date of any repair and a statement about the repair?	Yes	No	
3.24 Are repairs made in accordance with mandated timeframes following problem detection and receipt of necessary parts?	Yes	No	

#### 4. Wastewater

4.1 Are the floors cleaned using a spray bottle and dry mop or towel?	Yes	No
4.2 Is the floor immediately in front of the dry cleaning unit covered with a rug?	Yes	No
4.3 Is the mop/towel or rug dry cleaned to remove the dirt?	Yes	No
4.4 Have all the spotting table chemicals been checked to ensure that they do not contain Perc or Trichloroethene or any other regulated solvent?	Yes	No
4.5 Is the condensate from the spotting table(s) disposed of in the wastewater treatment and evaporator unit?	Yes	No
4.6 Are garments that require both wet wash and dry cleaning, managed so that wet cleaning is performed before dry cleaning?	Yes	No
4.7 Are all employees that handle Perc or maintain the dry cleaning machines required to wear gloves?	Yes	No
4.8 Is all equipment that comes in contact with Perc or used to perform maintenance on the dry cleaning machines kept separate from all other equipment?	Yes	No

#### 5. Waste Management

5.1 Does the facility generate less than 220 pounds of hazardous waste per month?	Yes	No - Skip to 5.3
5.2 Are less than 2,200 pounds of hazardous waste accumulated on-site?	Yes	No
5.3 Does the facility generate between 220 and 2,200 lbs of hazardous waste per month?	Yes	No

#### 6. Hazardous Waste Management

6.1 Were solvents collected and recycled as required by the procedures developed to prevent a release to the environment? Vapor collection and control systems will be properly maintained such that solvents are collected and recycled in an efficient manner.	Yes	No
6.2 Are all waste dry cleaning solvents, filters, lint, gloves, etc. from dry cleaning machine cleanout, button trap cleanout, pre-filter cleanout, spent diatomaceous earth, sludge, condensate or separator water, vacuum press condensate, mop water, still bottoms, or any other regulated waste material containing dry cleaning solvent managed as hazardous wastes, if not managed through the wastewater treatment unit and atomizer?	Yes	No
6.3 Are all waste materials stored in a tightly sealed container?	Yes	No

## 7. Hazardous Waste Storage (SQG/LQG Compliance and CESQG BMPs)

7.1 Are weekly container inspections performed and documented? These inspections are to ensure that the container is properly labeled, the lid is tightly secured and there are no leaks or spills.	Yes	No
7.2 Is each storage container labeled with the name of the contents (e.g., Perc waste, filters), "Hazardous Waste" and is the label readable?	Yes	No
7.3 Is each container that is being shipped, labeled according to the U.S. Department of Transportation (DOT) shipping requirements? (e.g., does it have a completed US DOT shipping label?) (DOT requires that a hazardous waste label be placed on the container which provides information about the waste being shipped and the business shipping the waste. The transporter typically puts a label on the container, but the dry cleaner is legally responsible for the label being affixed and completed correctly.)	Yes	No
7.4 Are containers in good condition and kept closed except when adding or removing waste?	Yes	No
7.5 Are the containers compatible with the type of waste being stored in them and are containers that have wastes which could react with each other separated by a physical barrier, like a dike, berm, or wall, or by a safe distance?	Yes	No
7.6 Are containers of hazardous waste accumulated on-site no longer than 180 days (270 days if shipped more than 200 miles to nearest facility) and is less than 6,000 kilograms (kgs) of waste accumulated on-site?	Yes	No
7.7 Is there adequate aisle space for unobstructed movement of emergency equipment and personnel? (Is adequate space available to respond to an emergency and remove injured personnel? Is the aisle clear of trash and obstacles?)	Yes	No
7.8 Does the facility have a spill kit containing equipment necessary to respond to a spill? (Materials needed to clean up a spill are labeled "spill kit" and located for easy access near potential spills).	Yes	No
7.9 Have employees been trained on how to properly manage waste?	Yes	No
7.10 Is an Emergency Coordinator identified and contact information posted next to the phone?	Yes	No

For Large Quantity Generators (LQGs) there are additional requirements:

7.11 Does the facility generate more than 2,200 lbs of hazardous waste in a month?	Yes	No - Skip 8.1
7.12 Are containers of hazardous waste accumulated on-site no longer than 90 days?	Yes	No
7.13 Is initial and annual refresher training provided to workers?	Yes	No
7.14 Does the facility have a written contingency plan to address spills or other emergency situations?	Yes	No

## 8. Containment

8.1 Is secondary containment provided for all dry cleaning equipment, wastewater treatment units, and tanks or containers of unused cleaning solvents, waste cleaning solvent, used filters, sludge, lint and solids contaminated with cleaning solvent?	Yes	No	
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8.2 Is secondary containment constructed of material impermeable to solvent and cleaning fluids, and able to withstand the weight of equipment of vessels stored within it?	Yes	No	
8.3 Is the secondary containment leak proof and capable of containing a minimum of 110% of the capacity of the largest vessel within it?	Yes	No	
8.4 Does the secondary containment extend beyond the outside perimeter of all dry cleaning equipment to enable containment of leaks and drips?	Yes	No	
8.5 If dry cleaning process chemicals or wastes are stored outside, are they secured to prevent unauthorized access and covered to protect from contact with storm water?	Yes	No	NA

### 9. Administrative Requirements, Recordkeeping and Reporting:

Permits, Licensing and Notifications	Yes	No	If Yes, provide the number
9.1 Is your facility name the same on all permits?	Yes	No	NA
9.2 Does your facility have an Environmental Protection Agency identification Number (EPA ID #)?	Yes	No	
9.3 Does your facility have an air permit number? This permit is issued by Clark County Department of Air Quality and Environmental Management.	Yes	No	
9.4 Does your facility have a current business license? This license is issued by the county and/or the municipality in which your facility is located.	Yes	No	
9.5 ACCESS: Do you provide access to environmental agency personnel to inspect operations, equipment and records at your business?	Yes	No	
9.6 POSTING: Are all permits and licenses posted in a conspicuous area for all to see?	Yes	No	
9.7 Is the current ownership the same as the ownership on the permit?	Yes	No	
9.8 Is the physical and mailing address the same as on the permit?	Yes	No	
9.9 Have there been any changes to machines including additions, removals or modifications.	Yes	No	
9.10 Are the hours of operation posted for all to see?	Yes	No	
9.11 RECORDS: Are five (5) years of the following records on file and available for an inspector to review? Purchases of Perchloroethylene, chemicals and equipment, records of repairs, hazardous waste manifests or invoices, daily, weekly and monthly machine maintenance logs.	Yes	No	
9.12 Was the calendar or monthly machine maintenance and Perc log provided to the Clark County Department of Air Quality and Environmental Management annually during their inspection? Note: Keep a copy in your files for five years.	Yes	No	
9.13 Did the facility submit a biennial generator report (for the last odd numbered year)?	Yes	No	
9.14 Did the facility maintain a copy of the biennial generator report on file?	Yes	No	
CESQG Best Management Practices and SQG/LQG compliance requirements:			
9.15 Did the facility ship hazardous waste out of the state? If YES, are copies of the manifest sent to NDEP?	Yes	No	

9.16 Does each shipment of hazardous waste have a manifest or receipt from the waste hauler that identifies manifest number and the type and quantity of waste shipped, and are they shipped to a permitted Treatment Storage Disposal Facility (TSDF)?	Yes	No
9.17 Is the waste properly listed on the manifest form or invoice (e.g., F002) and is the quantity shipped entered on the manifest form?	Yes	No
9.18 Are all copies of the manifest, or invoices that are signed by the transporter and disposal facility kept on file for at least 3 years?	Yes	No
9.19 Is a copy of the one-time Land Disposal Restriction (LDR) notification maintained on-site?	Yes	No