

US EPA ARCHIVE DOCUMENT

WASHOE COUNTY ENVIRONMENTAL RESULTS PROGRAM

PERCHLOROETHYLENE (PERC) DRY CLEANING ERP INSPECTION FORM			
PART 1: AIR			
THROUGHPUT/CONSUMPTION FIGURES:			
1.1 Has the Hazardous Waste Calendar or Monthly Machine Maintenance & Perchloroethylene Log been filled in for each month?	Yes	No	
1.2 Was the Calendar or Log provided to the Air Quality Management Division?	Yes	No	
MAINTENANCE PREFORMED ON THE VAPOR COLLECTION & CONTROL SYSTEMS:			
1.3 Was maintenance performed on the vapor collection and control system as specified in the equipment manual?	Yes	No	
1.4 Were solvents collected and recycled as required by the procedures?	Yes	No	
WASTE MATERIALS CONTAMINATED WITH SOLVENT:			
1.5 Are all waste materials stored in a tightly sealed container?	Yes	No	
OPERATIONS MANUAL(S) FOR EACH UNIT:			
1.6 Is the equipment operations manual stored on site?	Yes	No	
1.7 Does the Manual contain equipment design specifications?	Yes	No	
1.8 Does the Manual contain Standard Operating Procedures?	Yes	No	
1.9 Is the Machine operated according to manufacturers' specifications?	Yes	No	
1.10 Is the dry cleaning machine door kept closed, except for loading and unloading?	Yes	No	
1.11 Are all cartridge filters drained 24 hours before removal?	Yes	No	
DAILY/WEEKLY OPERATIONS CHECKS FOR EACH UNIT:			
Does the business complete a daily/weekly check list for the following:			
1.12 Leak Detection	Yes	No	
- Including all hose and pipe connections, fittings, couplings, and valves • Door gaskets • Filter gaskets • Pumps • Solvent tanks and containers • Muck cookers, stills • Water separator • Exhaust dampers • Diverter valves • Cartridge filter housing			
1.13 Date of any repair and a statement about the repair?	Yes	No	
1.14 Perc (solvent) usage?	Yes	No	
1.15 Other operation or maintenance information?	Yes	No	
1.16 Are repairs made in accordance with mandated timeframes following problem detection and receipt of necessary parts?	Yes	No	
1.17 Is the daily information recorded on a weekly maintenance log?	Yes	No	
1.18 Are Perc purchasing receipts recorded on the weekly maintenance log?	Yes	No	
1.19 Is the machine inspected monthly while in operation with a halogenated hydrocarbon detector or PCE gas analyzer per the July 28, 2008 requirements?	Yes	No	
1.20 If the facility purchased more than 2,100 gallons of perc in a 12-month period, is a PCE gas analyzer used for monthly leak detection?	Yes	No	N/A
SOURCE TYPE REQUIREMENTS			
1.21 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? (If Yes - Skip to 1.28 existing small area source.)	Yes	No	
Small and Large Dry-to-Dry Machine Control Requirements			
1.23 Do all dry-to-dry machines installed before 12/9/91 have an external refrigerated condenser OR a carbon adsorber that was installed prior to 9/22/93? (Choose N/A if machine installed after 12/9/91) (existing large area source)	Yes	No	N/A
1.25 Do all dry-to-dry machines installed after 12/9/91 have an internal refrigerated condenser? (Choose N/A if machine installed before 12/9/91) (new area source)	Yes	No	N/A
1.26 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)	Yes	No	N/A
1.27 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)	Yes	No	N/A
1.28 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	Yes	No	N/A Skip to

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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-mo period)			1.29
1.29 Is the concentration of perc less than 300 ppm?	Yes	No	
MACHINES WITH REFRIGERATED CONDENSERS:			
1.30 Does the machine have a refrigerated condenser?	Yes	No	
1.31 Is the machine equipped with refrigeration system pressure gauges?	Yes	No Skip to 1.32	
1.32 Are the high and low pressures of the refrigeration system read and recorded on a weekly basis? (Choose N/A if no pressure gauges)	Yes	No	N/A
1.33 Are the pressures within those specified by the manufacturer? (Choose N/A if no pressure gauges) Skip to 1.34	Yes	No	NA
You must measure the temperature of the perc in the cool-down air stream. If the air stream leaving the refrigerated condenser is still warm, perc vapors inside the drum will not be removed sufficiently. Measuring the temperature will show whether perc is being removed from the drying clothes and recycled back into the solvent tank. You must measure the temperature of the perc air stream on the outlet side of the refrigerated condenser. The temperature must be less than or equal to 45 degrees F.			
1.34 Is the outlet temperature less than 45 degrees F?	Yes	No	
If you have a transfer washer, you must measure the difference between the temperature of the perc air stream entering and exiting the refrigerated condenser. The temperature difference must be greater than or equal to 20 degrees F. For example, if the temperature of the perc air stream entering the refrigerated condenser is 90 degrees F and the temperature of the perc air stream exiting the refrigerated condenser is 50 degrees F, then the difference would be: 90 degrees F – 50 degrees F = 40 degrees F, which is greater than 20 degrees F.			
1.35 Is the temperature of the intake air and exit air greater than or equal to 20 degrees F?	Yes	No	
1.36 Are the date, temperature sensor or pressure gauge monitoring results recorded weekly?	Yes	No	
MACHINES WITH CARBON ADSORBERS: (as external controls)			
1.37 Does the machine have a carbon adsorber?	Yes	No	
1.38 Is the carbon desorption process performed weekly?	Yes	No	
1.39 Is the concentration of perc in the exhausted measured and recorded weekly?	Yes	No	
1.40 Is the perc concentration in the exhaust less than 100 ppm?	Yes	No	
PERMIT CONDITIONS			
ALTERATIONS: Have there been any changes to any of the following?			
1.41 Is the current ownership the same as the ownership on the permit?	Yes	No	
1.42 Is the physical and mailing address the same as on the permit?	Yes	No	
1.43 There have not been any changes to machines including additions, removals or modifications.	Yes	No	
1.44 POSTING: Can the Air Permit be seen near the equipment at all times?	Yes	No	
1.45 MODIFICATION OF EQUIPMENT: There were no modifications, repairs or adjustments made to the equipment.	Yes	No	
1.46 RECORDS: Are five (5) years of the following records on file and available for the Control Officer to review?	Yes	No	
1.47 Hours of operation?	Yes	No	
1.48 Chemicals and other supplies used DAILY?	Yes	No	
1.49 Fuel usage or products consumed?	Yes	No	
1.50 EQUIPMENT FAILURE: Where there any equipment breakdowns, upsets or failures?	Yes	No	
1.51 IF yes, was the Health District contacted as required by the Permit and District regulations?	Yes	No	
1.52 ACCESS: The Health District Control Officer can enter the business to inspect the operations, equipment and records required by the Air Permit whenever the District finds it necessary to review the compliance status of the business.	Yes	No	

PART 2: WASTE			
2.1 Does the facility generate less than 220 pounds of hazardous waste per month?	Yes	No - Skip to 2.3	
2.2 Are less than 2,200 pounds (5 drums) of hazardous waste accumulated on site?	Yes	No	
2.3 Does the facility generate between 220 and 2,200 lbs of hazardous waste per month?	Yes	No - Skip to 2.5	
2.4 Are containers of hazardous waste accumulated on site no longer than 180 days (270 if shipped more than 200 miles to nearest facility) and is less than 6,000 kg. of waste accumulated on site?	Yes	No	
2.5 Does the facility have an EPA site identification number?	Yes	No	
2.6 Are all waste dry cleaning solvents, filters, lint, 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.	Yes	No	
2.7 Did the facility submit a biennial generator report?	Yes	No	
2.8 Did the facility maintain a copy of the biennial generator report on file?	Yes	No	
2.9 Did the facility ship waste out of the State? If YES, record the manifest number(s) on the Administrative cover page.	Yes	No	
MANIFESTS AND SHIPPING RECORDS (SQG/LQG Compliance and CESQG BMPs)			
2.10 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 TSDR facility?	Yes	No	
2.11 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	
2.12 Are all copies of the manifest, or invoices that are signed by the hauler and disposal facility kept on file for at least 3 years?	Yes	No	
2.13 Is a copy of the one-time Land Disposal Restriction (LDR) notification maintained on site?	Yes	No	
2.14 Are weekly container inspections performed and documented?	Yes	No	
HAZARDOUS WASTE STORAGE (SQG/LQG Compliance and CESQG BMPs)			
2.15 Is each storage container labeled with the name of the contents (e.g., perc waste, filters), "Hazardous Waste" and is the label readable? Container may be labeled using purchased labels, a stencil, or the completed shipping label. Satellite accumulation containers also require the start date and EPA ID number be recorded on the label.	Yes	No	
2.16 Is each container that is being shipped labeled according to the US DOT Shipping requirements? (E.g. does it have a completed US DOT shipping label?)	Yes	No	
2.17 Are containers in good condition and kept closed except when adding or removing waste?	Yes	No	
2.18 Are the containers compatible with the type of waste being stored in them and are containers that have wastes that could react with each other separated by a physical barrier, like a dike, berm, or wall, or by a safe distance?	Yes	No	
2.19 Is there adequate aisle space for unobstructed movement of emergency equipment and personnel?	Yes	No	
2.20 Does the facility have a spill kit containing equipment necessary to respond to a spill?	Yes	No	
2.21 Have employees been trained on how to properly manage waste?	Yes	No	
2.22 Is an Emergency Coordinator identified and posted next to the phone?	Yes	No	
2.23 Does the facility generate more than 2,200 lbs of hazardous waste in a month?	Yes	No - Skip to Part 3	
2.24 Are containers of hazardous waste accumulated on-site no longer than 90 days?	Yes	No	
2.25 Is initial and annual refresher training provided to workers and documented in their personnel files?	Yes	No	
2.26 Does the facility have a written contingency plan?	Yes	No	

PART 3: WASTEWATER			NA
3.1 Are all waste dry cleaning solvents, filters, lint, 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 <u>regulated waste material containing dry cleaning solvent managed to prevent their entry into any drain, sanitary sewer, storm sewer, septic tank, boiler, cooling tower, or any underground structure.</u>	Yes	No	
3.2 Are all waste dry cleaning solvents, filters, lint, 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 <u>regulated waste material containing dry cleaning solvent managed so that they are not placed in a dumpster, trash receptacle, on the ground, or in any location other than in an appropriate waste storage container.</u>	Yes	No	
3.3 Are waste storage containers labeled according to the Resource Conservation and Recovery Act (RCRA) regulations?	Yes	No	
3.4 Are the waste storage containers kept closed at all times that material is not being added or removed?	Yes	No	
3.5 Are all invoices and/or manifests generated as a result of chemical and equipment purchases, equipment maintenance, disposal of dry cleaning solvent and associated wastes kept on-site for a minimum of three years?	Yes	No	
3.6 Does the unit include a monitor/alarm which shall shut down the unit when the initial filter becomes saturated?	Yes	No	
3.7 Has the monitor-alarm been bypassed, deactivated, or removed?	Yes	No	
3.8 Does the facility use a treatment device, i.e., an evaporator or atomizing device to dispose of all process wastewater(s)?	Yes	No Skip to 3.10	
3.9 Is the treated wastewater evaporated, misted or atomized so that there is no visible liquid deposition or accumulation?	Yes	No	
3.10 Does the facility operate an alternative device that has been approved by the Environmental Control Section?	Yes Skip to 3.18	No	
3.11 Is the unit directly plumbed to receive waste water generated from the dry cleaning machine?	Yes	No	
3.12 Does the unit include a primary solvent water separator settling chamber?	Yes	No	
3.13 Does the unit include an initial filtration following the settling chamber capable of removing dissolved solvent?	Yes	No	
3.14 Does the unit include secondary filtration following the initial filter capable of removing residual dissolved solvent?	Yes	No	
3.15 Are the manufacturer's maintenance recommendations for filter replacement and reactivation of the unit followed?	Yes	No	
3.16 Is the operations and maintenance manual for the unit maintained on site?	Yes	No	
3.17 Is the unit operated and maintained according to the manufacturer's recommendations and requirements?	Yes	No	
3.18 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	
3.19 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	
3.20 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	
3.21 Does the secondary containment extend beyond the outside perimeter of all dry cleaning equipment to enable containment of leaks and drips?	Yes	No	
3.22 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 NA	No	

