

US EPA ARCHIVE DOCUMENT

Welcome

Dry Cleaners Self-Inspection Program

Business Environmental
Program



College of Business Administration
University of Nevada, Reno

Workshop Outline

- Explain the Self-Certification Program.
- Review Compliance Requirements and Best Management Practices.
- Review Self-Certification Procedure and Eligibility for Certificate.

The Self-Inspection Process

- Use the Self-Inspection Manual.
- Perform a self-inspection of your facility and complete the Self-Inspection Checklist Form.
- If you find a compliance problem and can fix it, please do so before answering that question on the form.
- For questions that are answered “No”, complete a return to compliance form when applicable.
- Call BEP if you have questions (800)-882-3233.

Get a Certificate

- Submit your Self-Certification form and any required Return to Compliance Plans
- Receive a Certificate of Participation (suitable for display)
- Acknowledgement from the Division of Environmental Protection and UNR-BEP

PERC/PCE Purchases



Business Environmental Program



College of Business Administration
University of Nevada, Reno

2009 Dry Cleaner Compliance Calendar



Assisting Nevada businesses with environmental management issues
Free and Confidential Assistance
(800) 882-3233

www.envnv.org

This calendar was developed by the Business Environmental Program.

When to Calculate Your Usage?

- 1st business day of the month
 - record the amount of Perc/PCE purchased in the previous month.
 - compute a rolling total for the past 12 months.

How to Calculate Your Usage?

Total from Last Month		55
Subtract Perc Purchased		- 10
Subtotal		45
Purchased Date	Purchased Amount	12 Month Running total
	+	=
	=	

· For May, enter 12 month running total from last month (April 2009). Last month's number was calculated April 1, 2009 and includes purchases April 2008 through March 2009.

· Subtract the amount of Perc you bought during April 2008. You can find this amount from last year's records or calendar.

· If you bought Perc during April 2009, record the amount. If you bought no Perc write in "0".

· Add your April 2009 Perc purchase amount to the Subtotal. This is your rolling 12 month total of Perc consumption calculated 1st business day of May 2009.

Perc/PCE Purchase Receipts & Records

- Maintain Perc/PCE purchase receipts on site for 5 years!
 - This will meet federal/state requirements.
- Record purchases on the Washoe County Monthly Machine Maintenance and Perc/PCE Log and the Dry Cleaner Calendar.
 - Need a copy of the Perc/PCE Log WCAQM - 775-784-7200.
 - Download the calendar Free at www.envnv.org.
- Record the quantities of Perc/PCE each time you add it to the machine on both the Log and the Calendar.

Source Categories (Small/Large/Major)

Dry-to-Dry Machines	Perc /PCE Usage per 12 month period
Small Area Source (Purchased less Than):	140 gal Perc/PCE/ 12 month period
Large Area Source (Purchased between):	140 – 2,100 gal Perc/PCE/ 12 month period
Major Area Source (Purchased more than):	2,100 gal Perc/PCE/ 12 month period

“Episodic Events” : Source category will not change if the exceedances are episodic.

- If a facility had to purchase a new machine and had to fill it, this increase of Perc/PCE might move you to the next level.
- If no other exceedances in the last 3 yrs, then this would be considered an “Episodic Event”.

Equipment Requirements



Equipment Requirements

- The equipment operations manual is onsite.
- The manual contains the design specifications.
- The manual contains Standard Operating Procedures.
- The equipment is operated according to the manufacturer's specifications.

Specific Equipment Requirements

Existing Small Area Source

- If the Dry-to-Dry Machine(s) installed before 12/09/1991 and you purchased less than 140 gal of Perc/PCE/12month period.
 - **NO CONTROLS REQUIRED.**
 - In the Manual on page 6, question 2.5, in the YES box, write “skip to ‘2.11’”.

Specific Equipment Requirements

Existing Large Area Source

- If the Dry-to-Dry Machine(s) installed before 12/09/1991 and you purchased more than 140 gal of Perc/PCE/12month period.
 - The machine must have an external refrigerated condenser OR
 - The machine must have a carbon adsorber (a separate piece of equipment added to the machine).

Specific Equipment Requirements

New Area Source

- If the Dry-to-Dry Machine(s) installed after 12/09/1991.
 - The machine must have an internal refrigerated condenser (condenser coil built into the machine).

Equipment Requirements

- Machines installed after 12/21/05 must have an internal carbon adsorber (carbon adsorber is part of the machine).
- Machines installed after 12/21/05 must have a refrigerated condenser (condenser is part of the machine).

Equipment Requirements cont.

The Machine was installed after

12/21/05 OR

**Facility Purchased MORE than 2,100
gallons of Perc/PCE per 12 month
period**

- Measure the concentration of Perc/PCE in the drum at the end of the cycle WEEKLY with a colorimetric detector tube OR Perc/PCE gas analyzer.

January 2009

Dry Cleaner Name _____

Dry Cleaner Address _____

Perc Purchases Running

Total from Last Month December 2008			
Subtract Perc Purchased December 2007			-
Subtotal			
Purchase Date	Purchase Amount	12 Month Running Total	
	+		
	+		

Weekly Refrigerated Condenser Temperature Log*

Date	Outlet Temp during cool down	Temp less than or equal to 45F?	If No, problems	Date repaired
		Y N		
		Y N		
		Y N		
		Y N		
		Y N		

Monthly Hazardous Waste Generation Log

Machine filters changed out	No.	lbs.
Still bottoms generated		lbs.
Lint, wastewater filters		lbs.
Wastewater evaporated		gal
Date evaporator/mister carbon filters changed		
Containment pan seal checked?	Y N	
Only count wastewater collected towards haz. waste generator status if it is accumulated or stored prior to treatment in a wastewater evaporator unit or shipped off-site. Make sure the container is closed, labeled and dated.		

DAILY INSPECTIONS CONDUCTED BY? (circle one)

SIGHT

SMELL

FEEL

MONITORING INSTRUMENT

DAILY INPSECTIONS* REQUIRE WEEKLY DOCUMENTATION	LEAKING?		DATE			REASON FOR LEAK	DATE PARTS ORDERED	DATE PARTS RECEIVED	DATE REPAIRED
HOSES	N	Y	N	Y	N	Y	N	Y	
PIPE CONNECTIONS	N	Y	N	Y	N	Y	N	Y	
FITTINGS	N	Y	N	Y	N	Y	N	Y	
COUPLINGS	N	Y	N	Y	N	Y	N	Y	
VALVES	N	Y	N	Y	N	Y	N	Y	
DOOR GASKET	N	Y	N	Y	N	Y	N	Y	
DOOR SEATING	N	Y	N	Y	N	Y	N	Y	
PUMP	N	Y	N	Y	N	Y	N	Y	
SOLVENT TANK	N	Y	N	Y	N	Y	N	Y	
SOLVENT CONTAINER	N	Y	N	Y	N	Y	N	Y	
WATER SEPARATOR	N	Y	N	Y	N	Y	N	Y	
MUCK COOKER	N	Y	N	Y	N	Y	N	Y	
STILL	N	Y	N	Y	N	Y	N	Y	
EXHAUST DAMPER	N	Y	N	Y	N	Y	N	Y	
DIVERTER VALVE	N	Y	N	Y	N	Y	N	Y	
FILTER GASKET	N	Y	N	Y	N	Y	N	Y	
FILTER SEATING	N	Y	N	Y	N	Y	N	Y	
CARTRIDGE FILTER	N	Y	N	Y	N	Y	N	Y	
CLOSED WASTE CONTAINERS	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
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	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
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	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
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	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
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	N	Y	N	Y	N	Y	N	Y	
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	N	Y	N	Y	N	Y	N	Y	
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	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y	N	Y	N	Y	N	Y	
	N	Y							

*Note: Washoe District Health Department permit condition

MONTHLY MACHINE MAINTENANCE AND PERCHLOROETHYLENE LOG

CHECK EVERY 7 DAYS

Put N - for No Leak

Week ____ Week ____ Week ____ Week ____ Week ____

Put Y - for Perceptible Leak

Date Date Date Date Date

1) Hoses, pipe connections, fittings, couplings, and valves					
2) Door gaskets and seatings					
3) Filter gaskets and seatings					
4) Pumps					
5) Solvent tanks and containers					
6) Water separators					
7) Muck cookers					
8) Stills					
9) Exhaust dampers					
10) Diverter valves					
11) Cartridge filter housings					

CHECK EVERY 7 DAYS (Applicable Sections Only)

Week ____ Week ____ Week ____ Week ____ Week ____

(Monitoring not required for existing plants until
September 22, 1996)

Date Date Date Date Date

Transfer system (washer) temperature difference (Measure difference between inlet and outlet temperatures of refrigerated condenser) (Write °C or °F)					
Dry-to-dry machines, dryers, and reclaimers Condenser temperature (outlet) (Write °C or °F)					
Carbon adsorber concentration (ppm)					

Perchloroethylene purchased: _____ gallons (calculate on first of every month).

Running 12 month total _____ gallons per year.

Date and description of repairs or adjustments _____

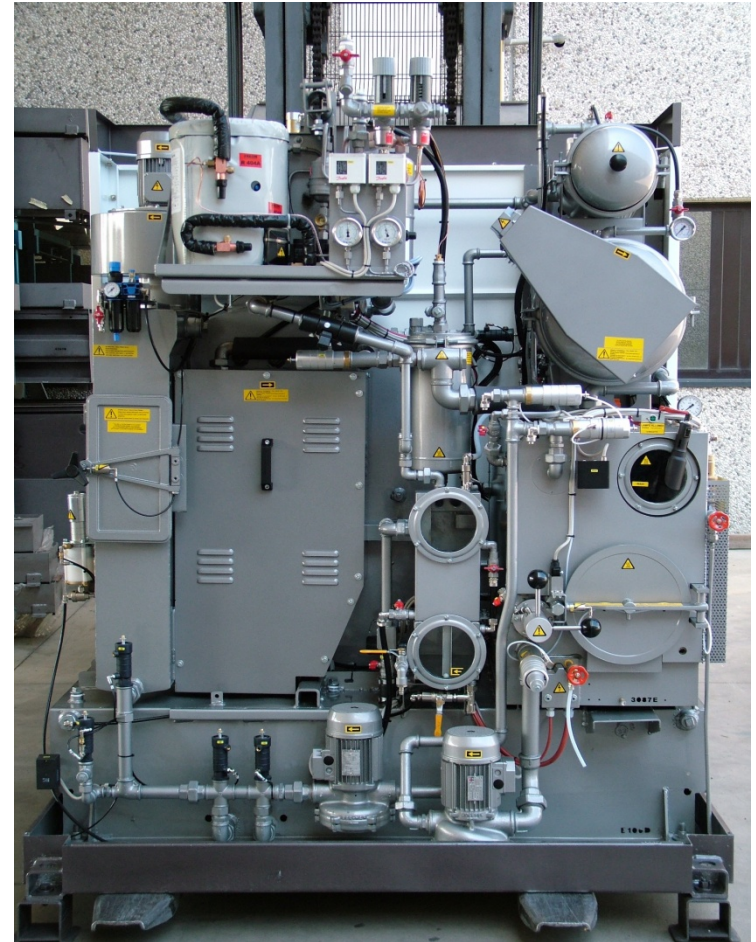
Were parts ordered? ____ If yes, when and what parts were ordered? _____

If yes, when were parts installed? _____

Staple or keep all solvent purchase receipts which also show perc volume, parts/repair invoices, and repair orders
(if written) with this sheet and save for at least five years.

Reminder!!!!

- More Perc/PCE
used
More regulations
=
Increase in time
&
Increase in cost
 - Maintain /operate equipment at its highest level of efficiency
 - Minimize Perc/PCE usage and purchase



Wastewater Evaporator & Atomizers



Wastewater Evaporators/Atomizers

Requirements

- The reason for this equipment is to prevent Perc/PCE being released into the sewer or potential for soil or groundwater discharge.
- These wastewater sources should be managed through the evaporator system:
 - Mop water.
 - Spotting table condensate.
 - Vacuum press condensate.
 - Condensate or separator water.

Wastewater Evaporators/Atomizers Requirements

- Any wastewater potentially contaminated with Perc/PCE should be managed as hazardous waste, unless it is managed (treated) in the evaporator unit.

Wastewater Evaporators/Atomizers Requirements

- Does the facility use a treatment device to dispose of all process wastewater?
- Is the treated wastewater evaporated, misted or atomized so that there is *no visible* liquid deposition?
- Does the facility operate an alternative device that has been approved by City of Reno or Sparks Environmental Control Section?

Wastewater Evaporators/Atomizers Requirements

- Is the unit plumbed to receive wastewater generated from the dry cleaning machines?
- Does the unit include a primary solvent water separator setting chamber?
- Does the unit include an initial filtration following the setting chamber capable of removing dissolved solvent?

Wastewater Evaporators/Atomizers Requirements

- Does the unit include an secondary filtration following the initial filter capable of removing residual dissolved solvent?
- Does the unit include a monitor/alarm which shut down the unit when the initial filter becomes saturated?
- Has the monitor-alarm been bypassed, deactivated, or removed?
- Does the facility have replacement filters on site?

Operations Maintenance



- Air regulations require that equipment be maintained & operated at manufacturer's specification.
- You will save \$ and environment.

Operations & Maintenance



- Is the door kept closed except for unloading & loading?
- Are all cartridge filters drained 24 hours before removal?
- Was maintenance performed on the vapor collection & control system as specified by the manual?

Leak Detection

Daily/Weekly Machine Maintenance Log & Dry Cleaning Calendar



Prices
€



Daily/Weekly Check

- The facility conducts daily leak detection as required by the Air Permit?
- The daily information is recorded on the maintenance log and dry cleaner calendar.
- Record other operations or maintenance information such as parts ordered.
- Record the volume of chemicals & other supplies used daily.

Leak Inspection

- Conduct a daily leak detection program. The visual leak inspection must include (***Sight & Smell***).
- The chosen detector or analyzer must be used to inspect the following parts of the systems while the dry cleaning system is operating:
 - Hose & pip connections, fittings, couplings, & valves.
 - Door gaskets & seating's.
 - Filter gaskets & seating's.
 - Pumps.
 - Solvent tanks & containers.
 - Water separators.
 - Muck cookers.
 - Stills.
 - Exhaust dampers.
 - Diverter valves.
 - All filter housings.

January 2009

Dry Cleaner Name _____
Dry Cleaner Address _____

Perc Purchases Running

Total from Last Month December 2008			
Subtract Perc Purchased December 2007			-
Subtotal			
Purchase Date	Purchase Amount	12 Month Running Total	
	+		
	+		

Weekly Refrigerated Condenser Temperature Log*

Date	Outlet Temp during cool down	Temp less than or equal to 45F?	If No, problems	Date repaired
		Y N		
		Y N		
		Y N		
		Y N		
		Y N		

Monthly Hazardous Waste Generation Log

Machine filters changed out	No.	lbs.
Still bottoms generated		lbs.
Lint, wastewater filters		lbs.
Wastewater evaporated		gal
Date evaporator/mister carbon filters changed		
Containment pan seal checked?	Y N	
Only count wastewater collected towards haz. waste generator status if it is accumulated or stored prior to treatment in a wastewater evaporator unit or shipped off-site. Make sure the container is closed, labeled and dated.		

DAILY INSPECTIONS CONDUCTED BY? (circle one)

SIGHT

SMELL

FEEL

MONITORING INSTRUMENT

DAILY INPSECTIONS* REQUIRE WEEKLY DOCUMENTATION	LEAKING? DATE						REASON FOR LEAK	DATE PARTS ORDERED	DATE PARTS RECEIVED	DATE REPAIRED
HOSES	N	Y	N	Y	N	Y	N	Y		
PIPE CONNECTIONS	N	Y	N	Y	N	Y	N	Y		
FITTINGS	N	Y	N	Y	N	Y	N	Y		
COUPLINGS	N	Y	N	Y	N	Y	N	Y		
VALVES	N	Y	N	Y	N	Y	N	Y		
DOOR GASKET	N	Y	N	Y	N	Y	N	Y		
DOOR SEATING	N	Y	N	Y	N	Y	N	Y		
PUMP	N	Y	N	Y	N	Y	N	Y		
SOLVENT TANK	N	Y	N	Y	N	Y	N	Y		
SOLVENT CONTAINER	N	Y	N	Y	N	Y	N	Y		
WATER SEPARATOR	N	Y	N	Y	N	Y	N	Y		
MUCK COOKER	N	Y	N	Y	N	Y	N	Y		
STILL	N	Y	N	Y	N	Y	N	Y		
EXHAUST DAMPER	N	Y	N	Y	N	Y	N	Y		
DIVERter VALVE	N	Y	N	Y	N	Y	N	Y		
FILTER GASKET	N	Y	N	Y	N	Y	N	Y		
FILTER SEATING	N	Y	N	Y	N	Y	N	Y		
CARTRIDGE FILTER	N	Y	N	Y	N	Y	N	Y		
CLOSED WASTE CONTAINERS	N	Y	N	Y	N	Y	N	Y	LABELED? Y N	DATED? Y N SHIPPED? Y N

*Note: Washoe District Health Department permit condition

MONTHLY MACHINE MAINTENANCE AND PERCHLOROETHYLENE LOG

CHECK EVERY 7 DAYS

Put N – for No Leak

Week ____ Week ____ Week ____ Week ____ Week ____

Put Y – for Perceptible Leak

Date Date Date Date Date

1) Hoses, pipe connections, fittings, couplings, and valves					
2) Door gaskets and seatings					
3) Filter gaskets and seatings					
4) Pumps					
5) Solvent tanks and containers					
6) Water separators					
7) Muck cookers					
8) Skills					
9) Exhaust dampers					
10) Diverter valves					
11) Cartridge filter housings					

CHECK EVERY 7 DAYS (Applicable Sections Only)

Week ____ Week ____ Week ____ Week ____ Week ____

(Monitoring not required for existing plants until
September 22, 1996)

Date Date Date Date Date

Transfer system (washer) temperature difference (Measure difference between inlet and outlet temperatures of refrigerated condenser) (Write °C or °F)					
Dry-to-dry machines, dryers, and reclaimers Condenser temperature (outlet) (Write °C or °F)					
Carbon adsorber concentration (ppm)					

Perchloroethylene purchased: _____ gallons (calculate on first of every month).

Running 12 month total _____ gallons per year.

Date and description of repairs or adjustments _____

Were parts ordered? ____ If yes, when and what parts were ordered? _____

If yes, when were parts installed? _____

Staple or keep all solvent purchase receipts which also show perc volume, parts/repair invoices, and repair orders
(if written) with this sheet and save for at least five years.

Requirements for Refrigerated Condensers

- Pressure gauges:
 - Is the machine is equipped with refrigerated system pressure gauges?
 - Measure & record the high & low pressure gauge readings on the Monthly Machine Maintenance & Perc/PCE Log and the Dry Cleaner Calendar, WEEKLY.
 - Are the readings within those specified by the manufacturer?

Requirements for Refrigerated Condensers

- The temperature of the Perc/PCE steam on the outlet side of the refrigerated condenser is $\leq 45^{\circ}\text{F}$.
- Calculate the difference between the temperature of the intake air and exit of the to determine if the difference in temperatures is $\geq 20^{\circ}\text{F}$.
- Record the temperature results on the Monthly Maintenance Log and Dry Cleaner Calendar, WEEKLY.

External Carbon Adsorber

- Only for Adsorbers added before 9/22/93 to equipment that was installed before 12/9/91.
- They are desorbed weekly.
- The concentration of Perc/PCE in the exhaust is <100ppm.

Carbon Adsorber

- Dry Cleaners using more than 2,100 gals of Perc/PCE in any 12 month period.
 - Perc/PCE concentration is ≤ 100 ppm for equipment passing exhaust through the carbon adsorber UPON opening the machine door.
 - Perc/PCE concentrations is ≤ 300 ppm from equipment passing exhaust through the carbon adsorber PRIOR to opening the machine door.

New leak Detection Requirements

- Must use detectors or analyzers monthly to conduct leak detections effective July 27, 2008.
- Record the results in the maintenance log.
 - Must use a Perc/PCE gas analyzer or halogenated hydrocarbon detector.
 - If use more than 2,100 gallons of Perc/PCE in any 12 month period, you must use a Perc/PCE gas analyzer.

Equipment Failure



Very heavy volume ...

Equipment Failure

- Report to the “Air Quality Control Officer” :
 - As soon as reasonably possible.
 - NO later than 2 hours after the occurrence OR
 - Within 2 hours of opening on the next business day if the incident occurs during off hours.
 - Written report submitted to the Air Quality Control Officer within 15 working days.

Equipment Failure

- “Repairs to be made with maximum reasonable effort”.
 - Off shift labor.
 - Overtime.
 - Work period of non-operations.

Reminder!!!

Federal Regulations



Mandate Repairs

- Within 24 hours.
- Parts ordered within 2 days.
- Repair parts installed within 5 working days.
- Record date of the repair.
- Record information about the repair including date of any parts ordered.
- Record date & time that Air Quality Inspector was notified.

Wastewater



Wastewater

- All Dry Cleaners need an Environmental Control Permit from the local wastewater Pretreatment Program.
 - Any wastewater that may be contaminated with Perc/PCE is PROHIBITED from entering the wastewater system.

Wastewater

Best Management Practices (BMP's)

- Proper control of wastewater will prevent the inadvertently discharge of Perc/PCE contaminated water from entering the sewer.
- Forgo mopping the floor & use towels or dry mop/with spray water to clean the floors.
- Use of alternative spotting chemicals that don't contain Perc/PCE.
- Vacuum water to be transferred to evaporator/atomizer or managed as a hazardous waste.

Wastewater BMP's

- Train employees on the proper handling of Perc/PCE and all other chemicals.
- Employee's should wear dedicated PPE while working on equipment or handling chemicals.
- PPE should be handled as hazardous waste.
- Are the floors cleaned using a spray bottle and dry mop or towel?
- Is the floor immediately in front of the dry cleaning unit covered with a rug?

Wastewater BMP's

- Is the mop/towel or rug dry cleaned to remove the dirt?
- Have all the spotting table chemicals been checked so they don't contain Perc/PCE?
- Is the condensate from the spotting tables disposed of in the wastewater treatment evaporator unit?
- Garments requiring laundering should be laundered PRIOR to dry cleaning.

Waste Management



Waste Management

- You need to determine your waste generator status .
 - LQG = 2,200 lbs or more.
 - SQG = 220 – 2,200 lbs.
 - ***CESQG = 220 or less lbs.***
- This is calculated on what is generated in any 1 month.

Waste Management

- The less hazardous waste you generate, the fewer the requirements. Does the facility generate less than 220 pounds of hazardous waste per month?
 - Are less than 2,200 pounds of hazardous waste accumulated on-site?
 - Does the facility generate between 220-2,200 pounds of hazardous waste per month?

Hazardous Waste Management

- Were solvent collected & recycled as required by procedures developed to prevent a release to the environment?
- This means
 - Vapor collection & control systems are properly maintained.
 - Solvents are recycled in an effective manner.

Hazardous Waste Management

- Are all dry cleaning waste being managed as hazardous waste?
 - Dry cleaning solvent, filters, gloves, etc. from dry cleaning machine cleanouts, button traps, pre-filter, spent diatomaceous earth, sludge, condensate or separator water, vacuum press condensate, mop water, still bottoms, other regulated waste containing dry cleaning material?
 - Unless managed through a wastewater treatment unit or atomizer for contaminated wastewaters.

Hazardous Waste Management

- Make sure that the containers are closed and stored in a compatible container and ready for shipment.
 - Are all waste materials stored in tightly sealed container?

SQG/LQG Requirements and Recommended BMPs for CESQG

- Are Weekly containers 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.
- Is each storage container labeled with name of the contents, “Hazardous Waste”?

SQG/LQG Requirements and Recommended BMPs for CESQG

- Is each container that is being shipped, label accordance with DOT shipping requirements?
 - There has to be a DOT hazardous waste shipping label filled out correctly and placed on the container.
 - Transporters typically put a label on the container, but the dry cleaner is legally responsible for the label being affixed and completed correctly.
- Are containers in good condition and kept closed except when adding or removing waste?

SQG/LQG Requirements and Recommended BMPs for CESQG

- 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:
 - Physical barrier.
 - Dike/berm/wall.
 - Safe distance.
- Are containers of hazardous waste accumulated on-site no longer than 180 days and less 6,000 kgs of waste accumulated on site?

SQG/LQG Requirements and Recommended BMPs for CESQG

- Is there adequate aisle space for unobstructed movement of emergency equipment and personnel?
- Does the facility have a spill kit containing equipment necessary to respond to a spill?
- Have employees been trained on how to properly manage waste.
- Is a Emergency Coordinator identified and contact information post next to the phones?

Additional LQG Requirements

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

Containment

- The municipalities of Reno and Sparks maintain regulations that require the containment of equipment and materials that are classified as hazardous waste.
 - Is secondary containment provided for all dry cleaning equipment, wastewater treatment units, tanks, tanks of unused/waste cleaning solvents, used filters, sludge, lint and solid contaminated with cleaning solvent?

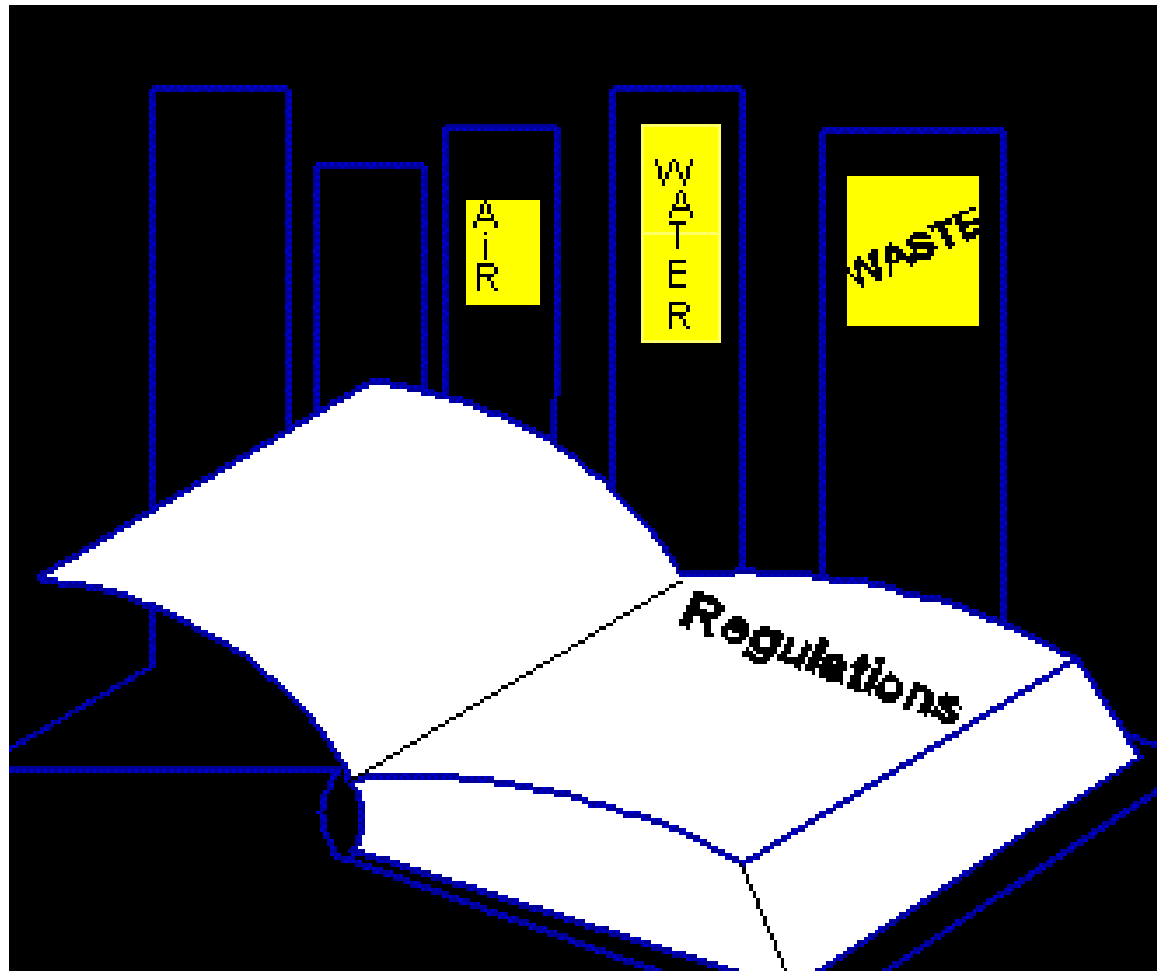
Containment

- Is secondary containment constructed of material impermeable to solvent and cleaning fluids, and able to withstand the weight of equipment or vessels stored within it?
- Is the secondary containment leak proof and capable of containing a minimum of 110 % of the largest vessel within it?
- Does the secondary containment extend beyond the outside perimeter of all dry cleaning equipment to enable containment of leak and drips?

Containment

- 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.

Administrative Requirements, Recordkeeping & Reporting



Permits, Licensing & Notification

- The following basic questions all address administrative & recordkeeping requirements that must be achieved for your facility to be in compliance.
 - A City of Reno or City of Sparks Business License.
 - A Washoe County Air Quality Management Division permit to operate the dry cleaning equipment.
 - A city of Reno or City of Sparks Environmental Control Permit for wastewater.
 - An EPA ID# may be used when disposing of Perc/PCE.

Permits, Licensing & Notification

- All permits & licenses are required to be posted in a conspicuous location for all to see.
- If the name on your permit is not the same, it may be necessary to list the various names as alias on other applications.
 - It is suggested that you be consistent and use the same name for all your permits and licenses.
 - If you have questions please call the UNR-BEP (775-689-6688).

Permits, Licensing & Notification

- Is your facility name the same on all permits
- Does your facility have an EPA ID#?
- Does your facility have an air permit number & is it issued by Washoe County Air Quality Management Division?
- Does your facility have wastewater permit number & the Environmental Control permit for wastewater is issued by the city in which the business resides?

Permits, Licensing & Notification

- A permit is a mechanism that the regulator uses to ensure that the regulations are being followed by the dry cleaner.
- The permit is a binding contract between the regulatory authority and the business.
 - Access: Do you provide access to environmental agency personnel to inspect operations, equipment & records at your business?

Permits, Licensing & Notification

- An air permit may be “Void” upon any changes in ownership, address or alterations to the permitted equipment.
- Therefore, it is very important that you contact the Washoe County Air Quality Management Division prior to implementing any changes in ownership, billing and physical address or modifications to the permitted equipment.

Permits, Licensing & Notification

- When there is a change in ownership or a change in location it is imperative the permitting agency be notified and permit modified accordingly.
- If a business has an EPA ID# for the disposal of the hazardous waste, the new owner should complete and submit a form 8700-12 to NDEP-BWM. (May use to change generator status.)
- This form is available on UNR-BEP website, www.envnv.org.

Permits, Licensing & Notification

- POSTING: Are all permits and licenses posted in a conspicuous area for all to see?
- Is the current ownership the same as the ownership on the permit?
- Is the physical and mailing address the same as on the permit?
- Are the hours of operations posted?

Permits, Licensing & Notification

- RECORDS: Are 5 years of the following records on file and available for the control officer to review.
 - Perc/PCE purchase.
 - Chemicals.
 - Equipment.
 - Record of repairs.
 - Hazardous waste manifest or invoices.
 - Daily, weekly and monthly machine maintenance logs.

Permits, Licensing & Notification

- The regulations require that any emergency upset or breakdown of equipment be reported to the Washoe County Air Quality Management Division.
- The county regulations state “The occurrence has been reported to the Control Officer as soon as reasonably possible, but in no case no more than 2 hours after the occurrence”.
 - A failure to call them is a violation.
 - In addition, a written report must be submitted to the control Officer within 15 day of such upset.

Permits, Licensing & Notification

- There have not been any changes to machines including additions, removals or modification.
- EQUIPMENT FAILURE: Were there any equipment breakdowns, upsets or failures?
- IF yes, was the Health District contacted as required by the Permit and District regulations.

Permits, Licensing & Notification

- Paperwork that has been completed and kept on file must be submitted in reports to the regulatory agencies.
- The reporting frequency is specified as either annually or bi-annually.
 - Was the calendar or monthly machine maintenance Perc/PCE log provided to the Air Quality Management Division annually during their inspections?
 - Keep a copy for 5 years.

Permits, Licensing & Notification

- The Biennial Generator Report is required to be submitted every other year for each of the facility with an EPA ID#.
- The report is for hazardous waste generation and management activities conducted in odd number calendar years.
- The next report is due in 2010.
 - Did the facility submit a biennial generator report for 2007 waste generation?
 - Did the facility maintain a copy of the biennial generator report on file?

Permits, Licensing, & Notification

- Manifest and Shipping Records must be maintained by CESQG, SQG, LQG.
- Manifest forms are designed to track hazardous and liquid industrial waste shipments from their point of generation to their final destination.
- You should have either a manifest or bill lading for each shipment of waste that is hauled away from the facility.

Permits, Licensing, & Notification

- Business that ship hazardous waste out of the State of Nevada for treatment or disposal must submit a copy of the treatment storage disposal facility (TSDF) signed manifest to the NDEP-BWM office.
- CEQSG BMP and SQG/LQG compliance requirements:
 - Did the facility ship hazardous waste out side the state?
 - If yes, are copies of the manifest sent to NDEP-BWM office.

Permits, Licensing, & Notification

- Does each facility ship hazardous waste have a manifest or receipt form the waste hauler that identifies manifest number and the type and quantity of waste shipped, and are they shipped to a permitted TSDF?
- Is the waste properly listed on the manifest form or invoice (F002) and is the quantity shipped entered on the manifest form?
- Are all copies of the manifest, or invoices that are signed by the transporter and disposal facility kept on file for 3 years?
- Is a copy of the one-time Land Disposal Restriction maintained on-site?

Permits, Licensing, & Notification

- The Land Disposal Restriction (LDR) program found in 40 CFR Part 268 requires specific types of treatment to be used to manage different hazardous waste.
- The LDR notification accompanies the initial shipment of each type of hazardous waste shipped to a recycling, treatment, or disposal facility and includes such information as waste code(s), the hazardous constituents present of waste, and/or waste analysis data.
- Generally your transporter will provide you with this.

Summary

- Use the manual.
- Complete and submit Self-Inspection Checklist form by May 31st, 2009.
- Only submit Return to Compliance (RTC) Plan for problems you can't correct before completing and submitting the Self-Inspection Checklist.
- Participate and receive recognition certificate.



Business Environmental Program



College of Business Administration
University of Nevada, Reno

- Free and Confidential
- Hazardous Waste and Pollution Prevention Assistance
- Phone, email and on-site assistance
- Fact Sheet and Newsletter Publications
- Seminars and Group Presentations
- Energy Assistance
- Funding provided by Nevada Division of Environmental Protection and Federal EPA

Assistance Line (800) 882-3233, Las Vegas (702) 866-5927

www.envnv.org

Please Fill Out the Evaluations.

