

Multimedia Inspection Checklist for Dry Cleaning Facilities

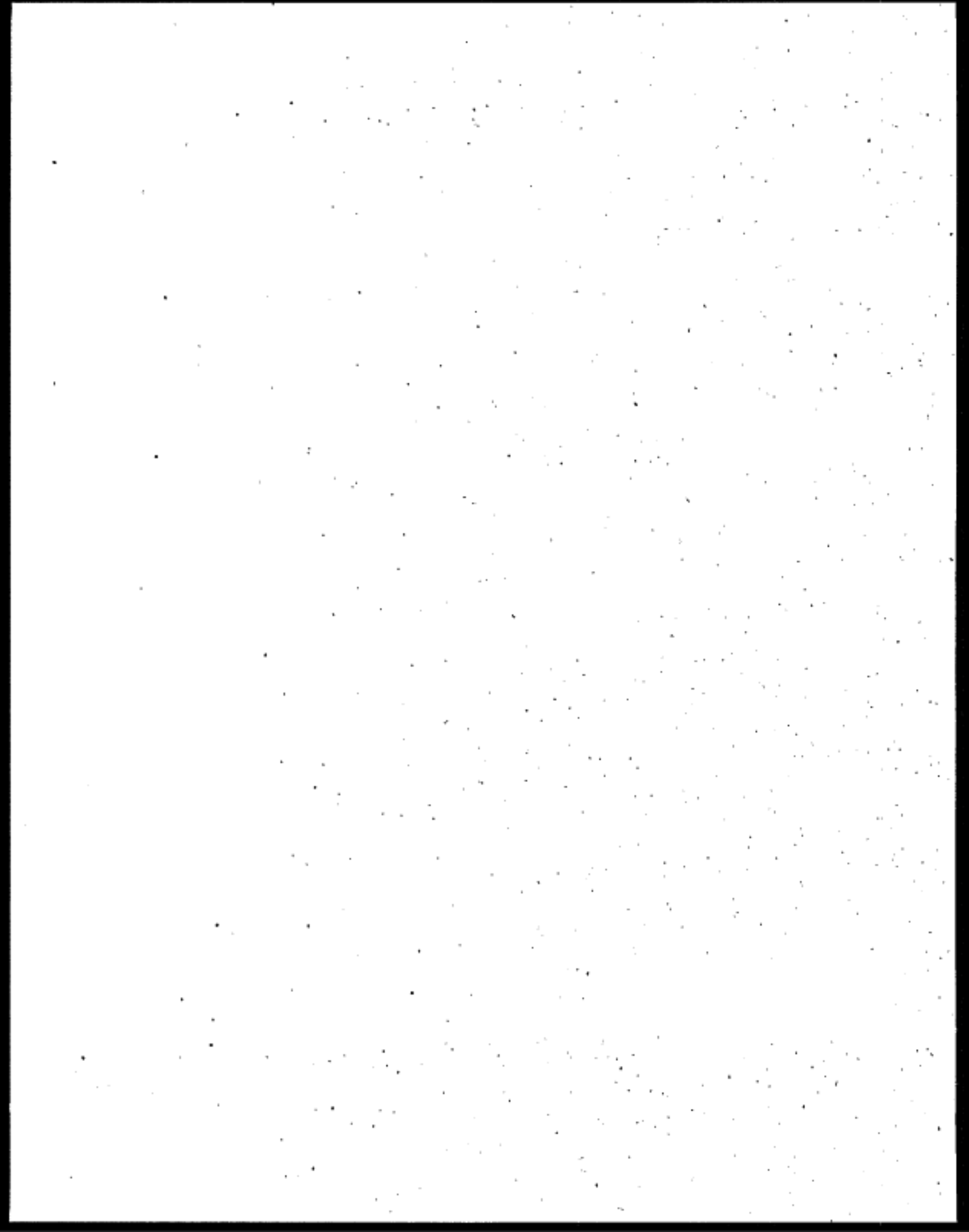
**An Excerpt from the USA EPA publication of
Multimedia Inspection Guidance for Dry Cleaning
Facilities
EPA/305-B-96-001**

APPENDIX A

**MULTIMEDIA INSPECTION CHECKLIST FOR
DRY CLEANING FACILITIES**

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MULTIMEDIA INSPECTION CHECKLIST FOR DRY CLEANING FACILITIES

I. GENERAL FACILITY AND MANAGEMENT INFORMATION

A. General Facility Information

1. Date of Inspection _____
 2. Facility Name: _____
 3. Facility Telephone Number: _____
 4. Facility Address (physical location):

 5. Mailing Address (if different):

 6. Facility Owner Contact Information
(Name and phone):

 7. Facility Operator/Manager (if different
from owner) (Name and phone):

 8. Inspector(s):

Name	Title/Affiliation	Phone Number
(1) _____	_____	_____
(2) _____	_____	_____
(3) _____	_____	_____
 9. Original establishment date of facility: _____
-

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10. Establishment date of current ownership:
11. Establishment date at current location:
12. Is a new annual perc consumption level calculated on the first of each month reflecting usage for the past 12 months? Yes ☐ No ☐

Record most current annual perc consumption:

Gallons: _____

From _____ (month, year) to _____ (month, year)

Date calculated: _____

13. Size categorization of facility under federal air emissions regulations (based on information in Question 12):

☐ Small area source

☐ Large area source

☐ Major source

14. Size categorization of facility under federal hazardous waste regulations:

☐ CESQG

☐ SQG

☐ LQG

15. Does the facility have an EPA ID # as a generator of hazardous wastes?

Yes ☐ No ☐

EPA ID #:

16. Does the facility discharge wastewater into a municipal sewer?

Yes ☐ No ☐

Name of POTW:

Permit # (if applicable):

If not, please explain.

B. Facility Management

17. Is the dry cleaner a member of a trade association?

Yes ☐ No ☐

If so, name of association: _____

If not, ensure that the dry cleaner is aware of the role of trade organizations in providing compliance assistance. Distribute national or local trade association literature as appropriate to serve as initial contact points.

18. What types of training activities are conducted at the facility (include safety, emergency procedures, and pollution prevention programs)?

19. Has a pollution prevention or waste minimization plan been developed by the facility?

Yes [] No []

If so, describe:

20. Has the facility evaluated which wastes are probable candidates for reductions through pollution prevention activities?

Yes [] No []

If so, list the wastes and describe pollution prevention activities currently being undertaken.

21. Is the facility owner familiar with multiprocess wet cleaning?

Yes [] No []

Has the facility considered experimenting with multiprocess wet cleaning?

Yes [] No []

II. DRY CLEANING PROCESS AREA

A. Dry Cleaning General Equipment Information

22. Supply the following information about the dry cleaning machines in use at the facility:

#	Type ⁱ	Date Installed	New or Existing	Manufacturer and model number	Perc filtration system(s) ⁱⁱ	Perc vapor recovery system ⁱⁱⁱ	Installation date of perc vapor recovery system
1							
2							
3							

ⁱDry-to-dry (D) or Transfer (T)

ⁱⁱList all types of filters used

ⁱⁱⁱRefrigerated condenser (RC) or carbon adsorber (CA)

23. New transfer machines are no longer allowed. Is the facility in compliance?

Yes [] No []

24. If existing transfer machines are used, has the facility performed a thorough cost analysis to determine what the payback period would be on the purchase of a dry-to-dry machine?

Yes [] No []

25. Existing transfer machines in major sources must be surrounded in a room enclosure by September 23, 1996. Is the facility in compliance?

Yes [] No []

26. Were any carbon adsorbers that are used as perc vapor recovery systems for drying process vapors installed before September 22, 1993?

Yes [] No []

27. Does the facility use a carbon adsorber as a residual perc recovery system to vent aeration Yes [] No []

B. Refrigerated Condensers Performance Monitoring

28. Are temperature sensors for refrigerated condensers installed for each machine in accordance with manufacturers' specifications? Yes [] No []
29. Are temperature sensors for all machines designed to measure temperatures from 32°F to 120°F to an accuracy of $\pm 2^\circ\text{F}$? Yes [] No []
30. Record temperature sensor readings if available:

Temperature Sensor	Machine #1	Machine #2	Machine #3	Criteria for compliance
(a) Dryer airstream at condenser outlet (°F)				Less than or equal to 45°F
(b) Washer airstream at condenser inlet (°F)				none
(c) Washer airstream at condenser outlet (°F)				none
(d) Washer airstream net temp. drop {(b) - (c)} (°F)				At least 20°F
(e) In compliance? (Y/N)				

C. Carbon Adsorber Performance Monitoring (complete if carbon adsorbers are used)

31. Are sampling ports for carbon adsorbers properly located in accordance with federal regulations (8 duct diameters downstream and 2 duct diameters upstream of any flow disturbance)? Yes [] No []
32. Are they kept closed when not in use? Yes [] No []
33. Indicate the established period desorption schedule for each machine (as necessary, as indicated by tests, but at least weekly). Note the date when each adsorber was last desorbed and measure the perc concentration in the exhaust with a colorimetric detector while the drying cycle is on. (Note: It is important to note that the perc concentration should usually be measured at the end of a use cycle, just prior to desorption. A measurement taken at any other time only ensures that the adsorber is in compliance at that time; not necessarily for the duration of the use cycle. However, given time and logistical limitations, inspections schedules generally cannot accommodate desorption schedules for each machine.

Machine #	Indicate Periodic Desorption Schedule ⁱ	Date Last Desorbed	Measured Perc Concentration in Exhaust Airstream	Use of Carbon Adsorber (A, B, or C as indicated by table below) ⁱⁱ	Perc Concentration Limit (as indicated by table below) ⁱⁱ
1					
2					
3					

³Indicate schedule specifics (day of week, etc.)

Carbon adsorber is used:	Indicate with	Perc Limit (ppm)
As main perc vapor recovery system	A	100
As residual vapor recovery system (tested during aeration while the door is open)	B	100
As residual vapor recovery system (tested during aeration while the door is closed)	C	300

D. Leak Detection

34. Is the odor of perc readily detectable anywhere in the facility? Yes ☐ No ☐

If so, where?

35. Is the leak detection program conducted weekly or biweekly as required? Yes ☐ No ☐

36. Allow owner or designated representative to guide you through the facility and demonstrate procedures for the weekly/biweekly leak detection inspection for each machine. The inspection should include the items listed below. Tabulate results and record any leaks detected.

Inspection done by:

☐ Sight, smell, and feel

☐ Monitoring instrument (Type: _____)

#	Components:	Signs of Leaking (Y, N, n/a)?			Explain all "Yes" answers:
		Machine #1	Machine #2	Machine #3	
1	Hose & pipe connections, fittings, couplings, valves				
2	Door gaskets & seatings				
3	Pumps				
4	Solvent tank & containers				
5	Water separators				
6	Muck'cookers				
7	Stills				
8	Exhaust dampers				
9	Diverter valves				
10	Filter gaskets and seatings				
11	Cartridge filter housings				

37. Are seals and gaskets periodically replaced before they become brittle? Yes [] No []

38. What type of solvent leak detection systems are in use?

39. What other methods does the facility use to detect leaks? (e.g., drip pans, etc.)

40. In transfer machines, is the exhaust damper easily accessible? Yes [] No []

If not, is there a suitable outlet downstream for testing the proper closure of the exhaust damper?

Yes [] No []

E. Miscellaneous Operation and Maintenance

41. Are all machines operated as per manufacturer's specifications and recommendations? Yes [] No []

42. Are machine doors kept closed except when transferring clothes? Yes [] No []

43. Are all spent cartridges drained at least 24 hours before disposal? Yes [] No []

Alternatively, are they steam stripped before disposal? Yes [] No []

III. PERC AND PERC WASTE HANDLING AREAS

A. Perc Storage and Dispensing

44. Is perc stored on-site? Yes [] No []

If so, is all perc stored in tightly sealed containers and free from leakage? Yes [] No []

45. How frequently is perc delivery available?

46. How is perc delivered to the dry cleaning machines?

B. Satellite Waste Accumulation Area

47. Do satellite waste accumulation areas contain less than 55 gallons of accumulating wastes? Yes [] No []

48. Are all full containers sealed and dated less than 3 days (72 hours) ago? Yes [] No []

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49. Are all containers tightly closed and free from leakage? Yes ☐ No ☐
50. Are all containers clearly marked as hazardous waste? Yes ☐ No ☐

C. Hazardous Waste Storage Area

51. Are all containers tightly closed and free from leakage or deterioration? Yes ☐ No ☐
52. Are all containers clearly marked as hazardous waste? Yes ☐ No ☐
53. Do all containers bear a date representing the day the container was filled and designated for disposal/treatment? Yes ☐ No ☐
54. Are all the dates on the containers in compliance with on-site waste storage time limits for generators of hazardous wastes? (No limit for CESQGs, 180 days for SQGs, 270 days for SQGs that must transport their wastes 200 miles.) Yes ☐ No ☐

Note the date of oldest container:

If the time limit is exceeded, does the facility have the required EPA permit for storage facilities? Yes ☐ No ☐

55. The facility must not be storing quantities of waste in excess of the quantity storage limits. Determine whether the facility is in compliance as follows:

Determine the total weight of all perc wastes in the storage area.

Each 15-gallon container can hold about 120 lbs (55 kg) of perc waste.

Each 55-gallon container can hold about 440 lbs (200 kg) of perc waste.
Maximum quantity limits are as follows: CESQG—2,200 lbs; SQG—13,200 lbs.

For 15-gallon containers:

_____ × 120 lbs/container = _____ lbs in storage
of full containers:

For 55-gallon containers:

_____ × 440 lbs/container = _____ lbs in storage
of full containers

On-site storage quantity limit (lbs): _____

Is the facility in compliance? Yes ☐ No ☐

D. Hazardous Wastes Shipping

56. Does the facility ship hazardous wastes off-site? Yes [] No []
57. Does the facility track the wastes with a manifest form? Yes [] No []
58. Are all containers labeled with the 4-inch DOT POISON label? Yes [] No []
59. Are all containers marked with the proper DOT shipping name and number? Yes [] No []

E. Wastewater Management

60. Does the facility discharge industrial wastewater into the following?
- Municipal sewer Yes [] No []
- On-site disposal system which meets the definition of injection well Yes [] No []
- Holding tank Yes [] No []

For discharges to municipal sewers:

61. Does the facility have a current wastewater permit? Yes [] No []
- If not, has the facility applied for a new permit? Yes [] No []

62. What parameters are limited and/or monitored in the facility's permit?

Parameter	Limit	Monitoring Frequency
(1) _____	_____	_____
(2) _____	_____	_____
(3) _____	_____	_____

63. Is monitoring conducted as required by the permit (with respect to sampling location, frequency)? Yes [] No []
64. Does the facility have a sampling point available which is representative of its process wastewaters discharged to the POTW? Yes [] No []
65. Is the effluent currently in compliance with the limitations established in the permit? Yes [] No []

If not, describe all violations found, including parameter limit exceeded, date of violation, and any follow-up samples or actions.

66. Has the discharge changed significantly since the permit was issued? Yes [] No []

If so, was the permitting authority notified? Yes [] No []

Describe the changes.

67. Describe any wastewater treatment employed at the facility.

68. If the facility discharges to a POTW, has it complied with the recordkeeping and reporting requirements contained in 40 CFR 403.12(o)? Yes [] No []

69. Has the facility ever discharged 15 kg of perc to the POTW within a calendar month? Yes [] No []

If so, were the proper authorities notified of the release? Yes [] No []

For discharges to injection wells:

70. Does the facility have a Federal or State UIC permits? Yes [] No []

71. Does the facility dispose of perc wastes and/or other hazardous chemicals in the injection well? Yes [] No []

For discharges to holding tanks:

72. Does the facility have the tank pumped out regularly by a licensed waste hauler for proper, legal disposal? Yes [] No []

IV. RECORDS AND FILES INSPECTION

A. Reporting

73. Did the facility file an initial report with EPA (by June 18, 1994, or upon startup for new facilities)? Yes [] No []

Date filed: _____

74. Did the facility file a compliance report (within 30 days of startup or 30 days after NESHAP regulations take effect)? Yes [] No []

Date filed: _____

Note to inspector: Ask to see copies of the initial report and compliance report.

B. Recordkeeping

75. Are the results of temperature sensor monitoring for refrigerated condensers kept on record for the past 5 years of operations? Yes [] No []

Do the results show that all refrigerated condensers are in compliance with performance requirements?
Yes [] No []

76. Are the results of colorimetric tube monitoring for carbon adsorbers kept on record for the past 5 years of operations? Yes [] No []

Has a periodic (at least weekly) desorption schedule been established and adhered to for each adsorber?
Yes [] No []

Does monitoring of adsorbers take place during the last run prior to desorption? Yes [] No []

Do the results show that all carbon adsorbers are in compliance with performance requirements?
Yes [] No []

77. Are monthly totals of perc purchase records kept on-site for the past 5 years? Yes [] No []

78. Are records of weekly/biweekly inspections for leaks available for each machine for the last 5 years (or since startup of facility)? Yes [] No []

79. Are any detected leaks repaired within 24 hours whenever possible? Yes [] No []

80. Are all needed repair parts ordered within 2 working days? Yes [] No []

81. Are needed repair parts installed within 5 days of receipt? Yes [] No []

82. Note any recurring problems:

83. Are copies of manifest forms maintained on-site for 3 years? Yes [] No []

84. Are any return copies of manifest forms (from the waste receiving facility) missing?
Yes [] No []

85. If so, have exception reports been filed and copies maintained on-site? Yes [] No []

What action has been taken to determine the status of the waste shipment or notify the proper authorities?

86. Are copies of the design specifications and operating manuals for each dry cleaning system and each emission control device kept on-site at the facility? Yes [] No []

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87. Has the solvent mileage been calculated for each machine?

Yes [] No []

If so, record the results (gallons perc/1,000 lb clothes) _____

If not, does the facility owner understand how to calculate solvent mileage and how to use it as a waste minimization indicator?

Yes [] No []

V. ADDITIONAL COMMENTS

