

# 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<br>Skip to |

|   |     |                          |      |
|---|-----|--------------------------|------|
| 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                       |      |
| <b>MACHINES WITH REFRIGERATED CONDENSERS:</b>   |     |                          |      |
| 1.30 Does the machine have a refrigerated condenser?  | Yes | No                       |      |
| 1.31 Is the machine equipped with refrigeration system pressure gauges?   | Yes | No<br>Skip<br>to<br>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:<br>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                       |      |
| <b>MACHINES WITH CARBON ADSORBERS: (as external controls)</b>   |     |                          |      |
| 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                       |      |
| <b>PERMIT CONDITIONS</b>  |     |                          |      |
| <b>ALTERATIONS: Have there been any changes to any of the following?</b>  |     |                          |      |
| 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<br>Skip<br>to<br>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<br>Skip<br>to<br>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<br>NA                 | No                       |    |

