

Perchloroethylene Dry Cleaners

Revised 2-13-04

Checklist of Requirements for Existing Large Area Sources

This checklist is for the Subpart M NESHAP for dry cleaners using Perchloroethylene (perc). The Subpart M NESHAP assigns requirements for dry cleaners into three categories (small area, large area, and major sources) based on the perc used in a year. These categories are then divided into **existing sources** (machines installed before 12-9-91) and **new sources** (machines installed after 12-9-91). The category applies to the machine, so a plant can have a mix of existing and new sources (machines) at the same facility

Small Area Source: Dry-to-dry Machines only at facility and use 0 - 140 gallons of perc per year

Large Area Source: Dry-to-dry Machines only at facility and use 140 - 2,100 gallons of perc per year

All lines should be checked, if not the plant may not be in compliance with the rules for Subpart M NESHAP for dry cleaners.

Note: Due to lack of perc transfer machines in the state, all requirements for transfer machines has been deleted from this checklist. If you have questions about transfer machines call Ron Reece of the Small Business Assistance Program at 801-536-4091.

Notification of Compliance Report Requirements

Notification of Compliance is to be submitted to the Division of Air Quality on or before **30 days after start-up** of new, used, or if additional dry cleaning machines are added to a facility which has previously filed.

_____ Send a letter signed by responsible company official:

1. Yearly perc consumption.
2. Whether or not compliance is met with 40 CFR 63 Subpart M Perchloroethylene Dry Cleaners.
3. All information contained in the statement is correct and accurate.

To satisfy this requirement, complete the "Notification of Compliance" form located on the internet at <http://www.airquality.utah.gov/PERMITS/FORMS/compstat.pdf>.

Control Equipment Requirements

_____ Use a refrigerated condenser. A carbon adsorber that was installed before September 22, 1993, may be used in place of the refrigerated condenser.

- _____ Do not vent the air-perc mixture from the refrigerated condenser to the atmosphere until the washer door is open. This includes a dry-to-dry machine when used with a reclaimer.
- _____ Do not use the same refrigerated condenser coil for a washer that is used by a dry-to-dry machine, dryer or reclaimer.
- _____ Use a diverter valve so air drawn into the dry cleaning machine when the door opens does not pass through the refrigerated condenser.
- _____ Never bypass a carbon adsorber.

Control Equipment Monitoring and Recording Requirements

When a **refrigerated condenser** is used, the following checks must be made weekly:

- _____ For a dry-to-dry machine measure the temperature at the end of the cycle, on the outlet side of the refrigerated condenser. (The temperature should be 45°F (7.2°C) or less.)
- _____ Maintain records of date of checks and temperature recorded. The example form may be used: "Monitoring Log for Refrigerated Condenser", located on the internet at <http://www.airquality.utah.gov/PERMITS/FORMS/reflog.pdf>.
- _____ If any parameters are not within the limits, adjustments and repairs must be made. Parts must be ordered within two working days of detection, and must be installed within five working days after receipt.

When a carbon adsorber is used, the following checks must be made weekly:

- _____ Measure the perc concentrations **out of the carbon adsorber** with a colorimetric detector tube while the machine is venting to the carbon adsorber at the end of the last cycle prior to desorption of the carbon adsorber. The perc concentration must not exceed 100 ppm.
- _____ Provide a sampling port for monitoring within the exhaust outlet of the carbon adsorber that is easily accessible and located at least 8 stack or duct diameters downstream from any flow disturbance such as a bend, expansion, contraction, or outlet; downstream from no other inlet; and 2 stack or duct diameters upstream from any flow disturbance.
- _____ Maintain records of date of checks and perc concentration recorded. The example form may be used: "Monitoring Log for Carbon Adsorber", located on the internet at <http://www.airquality.utah.gov/PERMITS/FORMS/carlog.pdf>.
- _____ If any parameters are not within the limits, adjustments and repairs must be made. Parts must be ordered within two working days of detection, and must be installed within five working days after receipt.

Pollution Prevention Operating Procedure Requirements

- _____ Maintain on-site, a copy of the design specifications and operating manuals for each machine and control device at the facility.
- _____ Keep machine doors closed at all times except when transferring clothes.
- _____ Operate and maintain system according to manufacturer's specifications and recommendations.
- _____ Drain cartridge filters in their housings or other sealed container for 24 hours before removing from facility.
- _____ Store all perc solvent and waste in sealed containers.

Pollution Prevention Inspection and Repair Requirements

- _____ Inspect equipment every week for perceptible leaks while the dry cleaning system is operating. The example form may be used: "Equipment Inspection and Repair Log", located on the internet at: <http://www.airquality.utah.gov/PERMITS/FORMS/i-rlog.pdf>.
- _____ Maintain for five years records of inspection dates, name and location of system components where leaks are found, dates of repair and record of written or verbal part orders. The example form may be used: "Equipment Inspection and Repair Log", located on the internet at <http://www.airquality.utah.gov/PERMITS/FORMS/i-rlog.pdf>.
- _____ Repair perceptible leaks within 24 hours. Parts must be ordered within two working days and installed within five days of receipt.

Pollution Prevention Recordkeeping Requirements

- _____ On the first working day of every month the following calculations must be performed:
 1. Sum of the volume of perc purchases made in each of the previous 12 months. Show calculations.
 2. Record purchases for each month in a log. The example forms may be used: Perchloroethylene Log, 'First 12 months' and then 'Month 13 and beyond', forms are located on the internet at <http://www.airquality.utah.gov/PERMITS/FORMS/perclog1to12.pdf> and <http://www.airquality.utah.gov/PERMITS/FORMS/perclog12+.pdf> .
 3. If no purchases were made, **record zero gallons** were purchased.
 4. Evaluate and record the total sum to determine the new source category.

If the source category increases, then new requirements must be met within 180 days. Within 30 days after meeting new requirements the owner/operator must send a letter to the Division of Air Quality, stating:

1. The new yearly perc consumption.

2. Whether or not compliance is met with 40 CFR 63 Subpart M Perchloroethylene Dry Cleaners.
3. All information contained in the statement is correct and accurate.
4. Maintain all records for five years.

To satisfy this requirement, complete the "Notification of Compliance" form located on the internet at <http://www.airquality.utah.gov/PERMITS/FORMS/compstat.pdf>.

For more information or assistance, please contact the Division of Air Quality's Small Business Assistance Program's Ron Reece at 536-4000 and outside Salt Lake City at 1-800-270-4440.

Note: The information presented is an aid to compliance. It is not a substitute for state or federal rules. It is responsibility of the business to be familiar with the rules and all their provisions.