



NEW JERSEY SMALL BUSINESS
ENVIRONMENTAL ASSISTANCE PROGRAM

Dry Cleaner Checklist



New Jersey Department of Environmental Protection
Office of Pollution Prevention and Release Prevention

Use of this Checklist

This checklist provides a general overview of regulations, pollution prevention, and safety techniques that can be applied to dry cleaning operations. State and Federal rules and regulations take precedence over this checklist.

Maximum Achievable Control Technology

The Clean Air Act defines perchloroethylene (PERC) as a "Hazardous Air Pollutant." In the Clean Air Act Amendments of 1990, Congress directed the USEPA to use a "technology and performance-based approach" to reduce emissions of hazardous air pollutants. These standards are known as "Maximum Achievable Control Technology" (MACT) standards. They are based on emissions levels that are already being achieved by the better-controlled and lower-emitting sources.

Dry cleaning facilities are the largest source of PERC emission in the United States. EPA's rules require all dry cleaners that use PERC to implement pollution prevention measures, install specific equipment controls, and record the quantity of PERC a facility uses.

What is Pollution Prevention?

Pollution Prevention (P2), also known as source reduction, attempts to stop pollution before it starts. P2 encourages industries to realize the potential economic benefits of reducing the use and generation of hazardous substances. Implementing P2 can reduce or eliminate hazardous and environmentally harmful substances that will ultimately be disposed of, discharged, or released to the environment.

While every dry cleaning operation differs, every facility creates waste. There are common elements applicable to all dry cleaners that are a cost of doing business, which can be reduced with proper planning. One can prevent pollution through implementing the techniques that are applicable to dry cleaning facilities.

Who Should Implement Pollution Prevention?

Dry cleaners that use hazardous substances, produce hazardous waste and want to improve their environmental performance, reduce their environmental obligations and liability should implement P2. Furthermore, any business that wants to keep one step ahead of the competition by increasing efficiency and **reducing operating costs** should implement P2. A business can **save money** through P2 methods. Implementing P2 will also help make the work environment safer for all employees, promote better community relations, and protect the environment. Environmentally responsible business practices also can be used as a marketing tool!

Pollution Prevention Practices in Dry Cleaner Facilities

Pressure from the government and the public to reduce hazardous waste disposal, discharges and releases of pollutants is changing the way companies do business. These changes are becoming increasingly focused on pollution prevention. Wastes will vary from each dry cleaner, but the overall source reduction of these wastes will benefit the facilities by reducing raw material needs, lowering disposal and treatment costs, and by decreasing the long term liabilities associated with waste disposal.

To reduce cost and liability, the dry cleaning industry should examine three major types of waste generation.

1. **Solid Waste/ Hazardous Waste** – Dry cleaner waste generally consists of spent lint, used parts, spent cleaning solutions, empty containers, outdated materials, shop towels, filters, cartridges, and still bottoms. (some of the wastes mentioned may be considered hazardous).
2. **Wastewater** – Dry cleaner liquid waste generally consists of water that comes in contact with pollutants and solvents.
3. **Air Emissions** – Air contaminants from dry cleaning operations, such as Volatile Organic Compounds (VOC), Hazardous Air Pollutants (HAPs), and particulates are produced from the use of cleaning solvents, and other agents.

Dry Cleaner Facility Contact List

Pollution Prevention

NJDEP - Small Business Assistance Program
(877) 753-1151 [toll free] or (609) 292-3600
NJDEP - Pollution Prevention & Release Prevention
(609) 777-0518
www.state.nj.us/dep/opppc

Air Permits

NJDEP - Bureau of New Source Review
(800) 441-0065 [within NJ] or (609) 292-6716

Hazardous Waste

EPA RCRA ID# - (212) 637-4106
NJDEP - NJX ID# - (609) 292-7081

Underground Storage Tanks

NJDEP – Bureau of Underground Storage Tanks
(609) 292-8761

Wastewater

NJDEP - Pretreatment Residuals
(609) 633-3823
NJDEP - Stormwater or Septic Permits
(609) 633-7021
NJDEP - Point source discharges to surface water permits
(609) 633-3869 or (609) 292-4860

Compliance Assistance Program

NJDEP - Greenstart
(609) 633-0727

Right to Know

NJDEP - Bureau of Chemical Release Information and Prevention
(609) 292-6714

Department of Community Affairs

Boiler Operator Construction Code Element and Licensing.
(609) 984-2248

Federal MACT (AIR) Requirements

USEPA Region II / Compliance Assistance Program
(212) 637-3497

Other Sources of Help

Small Business Ombudsman - NJ Commerce - (800) 643-6090
Occupational Safety and Health Administration (OSHA)
(800)-321-6742 [toll free]
USEPA Region II - (212) 637-3413
NJDEP - Minor Source Compliance Investigations
(609) 584-4240

NJDEP Hotline

(877) WARN-DEP

Dry Cleaner Associations

Neighborhood Cleaners Association
(212) 967-3002
Korean American Cleaners Association of New Jersey
(732) 283-5135
North East Fabricare Association
(800) 442-6848

Inventory:

- ❑ Solvents and cleaners should be inspected when received. If these materials are damaged or off-specification, they should be returned immediately.
- ❑ Maintain Material Safety Data Sheets (MSDS) and a list of all toxic chemicals.
- ❑ Keep records of PERC purchases for five years.

Boiler Requirements:

- ❑ Obtain a boiler certificate and license through the Department of Community Affairs.
- ❑ Current boiler certificate must be posted or available in a file when an inspection occurs.
- ❑ Current boiler license (seal) for the boiler operator must be posted or available when an inspection occurs.
- ❑ A license holder must be in the building at all times when the boiler is in operation.
- ❑ Boilers over 1 million BTU heat input require an air permit from the NJDEP, in addition to a registration, which should be posted near the boiler or in a file.

Wastewater Permit:

- ❑ Wastewater that comes in contact with dry cleaning solvents (PERC) can not be discharged to septic systems, storm sewers, or surface water.
- ❑ Obtain authorization from a Publicly Owned Treatment Works (POTW) prior to discharging to the sanitary sewer.

Air Permits:

- ❑ All dry cleaning equipment requires an air permit regardless of cleaning solvent (e.g. PERC, Hydrocarbon, Carbon dioxide, Silicone-based).
- ❑ Air Permits are renewed every five years.
- ❑ Air Permits should be posted near the machine or in a file and be available when an inspection occurs. (Note: Permit certificates can be obtained on-line.)
- ❑ Records must be kept regarding:
 - ❑ Monthly calculations of the 12 month rolling total of PERC usage;
 - ❑ Weekly condenser temperature readings at the end of cycle and the date of the last instrument calibration;
 - ❑ Weekly vapor and liquid leak inspections;
 - ❑ Dry cleaning machine repair records.
- ❑ Condenser temperature reading should be less than or equal to 45°F at end of cycle.
- ❑ Note: A useful tool to keep track of your records is the [Small Business Environmental Assistance Program Dry Cleaner Compliance Calendar](#).
- ❑ After purchasing an existing dry cleaning facility, you must transfer ownership of air permits within 120 days.

Good Housekeeping:

- ❑ Perform regular inspections and maintenance on equipment to ensure that all machinery and processes are working efficiently. Check for leaks and spills from gaskets, hose couplings, flanges, and pumps. Check relief valves for closure and worn gaskets on button trap. Check for holes in the air and exhaust ducts. Make repairs immediately and keep records of repairs.
- ❑ Prohibit the mixing of hazardous waste and non-hazardous waste. By keeping them separate you can readily recycle non-hazardous waste. When you mix hazardous with non-hazardous waste, all of the waste becomes hazardous.
- ❑ Ensure floors under the dry cleaning machine and in the area around the machine, especially behind the machine, are made of noncombustible material, free of oil, grease and cracks, and are sealed with epoxy resins.
- ❑ Recover solvents from filter cartridges by draining the filter (24 hours) and heating/stripping cartridges in their housing or in a sealed container to remove additional solvent.
- ❑ Size loads (neither under or over) to maximize solvent efficiency.
- ❑ Do not short cycle loads or manually clean.
- ❑ Avoid dispensing or transferring PERC liquid to and from storage containers. Consider using a sealed small quantity delivery system.
- ❑ Clean lint screens regularly to avoid clogging fans and condensers.
- ❑ Place dry cleaning machine on a containment pad.
- ❑ Use drip pans when conveying hazardous substances or repairing equipment.

Right to Know:

- ❑ Complete the Right to Know Survey and submit to NJDEP, local police department, local fire department, and County Right to Know Agency by March 1 every year.
- ❑ Keep a copy for your files for 5 years.

Hazardous Waste:

- ❑ Keep hazardous waste (HW) records for 3 years from the disposal of spent cleaning solutions, filters and still bottoms.
- ❑ Use licensed HW carrier when disposing of HW.
- ❑ Label hazardous waste containers properly. Do not add hazardous waste to a container if it is not labeled.
- ❑ Container labels should have the date when it was filled, quantity, contents, name and address of the dry cleaner.
- ❑ HW containers must be sealed when not in use.
- ❑ If you generate less than 220 lbs. (100 kg) of HW &/or ≤ 2.2 lbs. (1 kg) acute HW per month you are a Conditionally Exempt Small Quantity Generator.
- ❑ If you generate more than 220 lbs. (100 kg) HW &/or ≤ 2.2 lbs. (1 kg) of acute HW per month, you are a small quantity generator. Therefore you need to obtain an EPA id # by calling 212-637-4106. Do not hold hazardous waste more than 180 days. (Follow rules on managing accumulating treating, storage and disposal.)

Material and Storage:

- ❑ Underground storage tanks (UST) and above ground storage tanks may require permits from the NJDEP.
- ❑ Ensure flammable and hazardous liquids are stored in containers that are approved by the U.S. Department of Transportation, or by the New Jersey Division of Fire Safety or by the National Registration and Testing Laboratory (UL-Listed).
- ❑ Close chemical containers between use to reduce evaporation, spills and contamination.
- ❑ Label waste storage areas, containers, tanks, and cabinets with the contents (e.g. spotting solvents).
- ❑ Ensure containers that hold flammable liquids are grounded.
- ❑ Ensure containers are closed tightly during transportation.
- ❑ Drums of solvent cleaners and hazardous materials should be stored in safe and secure areas. The storage area should have secondary containment such as a spill pallet or berm, and should not be exposed to stormwater. The floor in the area should be sealed and coated with epoxy resin.
- ❑ Tightly seal bungs and lids on safety cans or containers of raw material and wastes to reduce evaporation, spills and contamination.

Building:

- ❑ Electrical outlets, conduits, pipes, or any other openings in walls or ceilings should be sealed to prevent the spread of fire
- ❑ A fire extinguisher should be available, and inspected yearly.
- ❑ Ensure signs are posted over each fire extinguisher.
- ❑ Ensure aisles and emergency exits are kept clear
- ❑ Facilities with more than one door should post exit signs over each door.
- ❑ Ensure electrical outlets are covered with plates. No wires are frayed, damaged, or taped off.
- ❑ Extension cords must be intact and of equal or larger gauge than the appliance being used, have grounding prongs, and be temporary in nature.

Health and Safety:

- ❑ Maintain spill-kits and instruct all employees in the proper use and location of the spill-kits. Employ spill containment techniques.
- ❑ Post emergency phone numbers for the local police department, fire department and the NJDEP.
- ❑ Post chemical hazard, safety, and emergency preparedness instructions at visible locations and train employees in their use.
- ❑ When cleaning dry cleaning equipment use an apron, gloves and safety glasses at all times to prevent personal injury.

