



Lincoln-Lancaster County
Health Department
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(402) 441-8040

Frequently Asked Questions

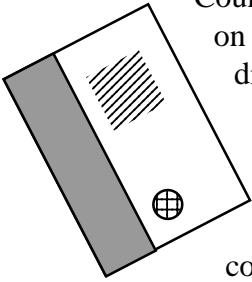
for Facilities Dry Cleaning with
Perchloroethylene

September 1996

Where can I get information about the final ruling on the use and disposal of Perchloroethylene (perc)?

The final perc dry cleaning rule was published in the *Federal Register*, September 22, 1993. Amendments to this rule were published in the *Federal Register*, December 20, 1993. These rules

were adopted by the Lincoln-Lancaster County Health Department (LLCHD) on May 5, 1994. The following brief discussion of the perc ruling should answer most of your questions. Contact the LLCHD (441-8040) for complete details, report forms, and copies of the rule.



Who needs to comply with these rules?

This regulation applies to each owner or operator of a dry cleaning facility who uses perc. *Any* dry cleaner using perc *in any way* must report the consumption to the LLCHD.

Even operators of coin-operated laundries must comply with the rules if they or any employees place articles in a cleaning machine, turn on the machine, or remove articles from the machine.

Why is EPA and the LLCHD concerned about perc?

Perchloroethylene is a synonym for tetrachloroethylene as a hazardous air pollutant. It is a carcinogen and is toxic. As amounts build up in the environment, it can accumulate in food sources. It can affect unborn children.

What are the reporting requirements?

All owners or operators of dry cleaning establishments using perc as a cleaning solvent *must* have submitted reports to the LLCHD:

- * Initial Notification by June 18, 1994, or now if the notification has not been submitted and
- * Compliance Report for Pollution Prevention by June 18, 1994.

What are the compliance requirements for control devices?

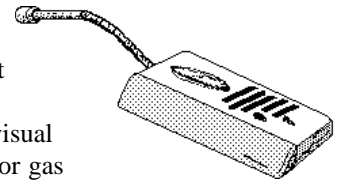
The final deadline for existing dry cleaners to initiate pollution prevention (P2) steps is **September 23, 1996**. Perc vapor recovery systems (such as refrigerated condensers and carbon absorbers) are required for *all* machines by September 23, 1996. Furthermore, by October 22, 1996, each facility must submit the following control equipment compliance information:

- * a yearly PCE consumption report,
- * a statement indicating whether or not compliance is met for items on this guide, and
- * a statement that all information contained in these reports is correct and accurate.

What are some of the pollution prevention (P2) practices I must use in my business to reduce my perc emissions?

The following P2 practices must be performed at each perc dry cleaning establishment:

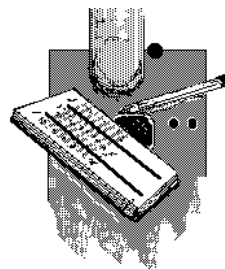
- * Conduct a weekly leak detection and repair program to inspect all dry cleaning equipment for perceptible leaks (detect odors, make a visual inspection, and check for gas flow by passing your fingers over the surface of the equipment).
- * Repair leaks within 24 hours after they are found or order repair parts within two working days after detecting a leak that needs repair parts. Install parts within five working days after receipt.
- * Keep a log of the results and findings of weekly inspection and repair programs.
- * Keep all perc and wastes containing perc in covered, leak-free containers; keep draining cartridge filters in closed containers, and keep machine doors shut when clothing is not being transferred.
- * Operate and maintain all dry cleaning equipment according to manufacturer's instructions.



What records do I need to keep?

The following records must be kept at each perc dry cleaning establishment for *five* years:

- * a log of the results of leak detection and repair programs,
- * a log of the amount of perc purchased each month for the past 12 months, and
- * the operation and maintenance manuals for all dry cleaning or perc emitting equipment at the plant.



What are my monitoring requirements?

All owners or operators with machines are required to have emission controls (refrigerated condensers and/or carbon absorbers) and must monitor the machines weekly, keeping a log of the results. Specifications regarding monitoring procedures and results can be found in the regulations cited earlier. For more information, call the LLCHD, 441-8040.

Are there funds available to me so I can purchase the proper monitoring controls or modify my machines to comply with the EPA rules?

One possible source of funds is through Climate Wise, a voluntary partnership that can help your business turn energy efficiency and pollution prevention into corporate assets. Climate Wise is a joint effort between two federal agencies—the

Department of Energy (DOE) and the EPA. It is administered locally by the Nebraska DOE.

Your first step is to volunteer to be a Climate Wise Partner. You must also develop and implement an action plan that prioritizes energy and pollution prevention opportunities according to your business goals and investment criteria. You will then have access to low-interest financing for qualifying improvements. Positive public recognition for partners is available through the Nebraska Department of Energy; call 471-2867 and ask for Kirk Conger, P.E.

When a new dry-to-dry machine is installed, how is the initial load of perc reported to the EPA?

A new dry-to-dry machine with a capacity of 255 gallons may carry an initial load of 250 gallons of perc. This initial load must be reported in the year it is purchased. This purchase might cause a small area source to be permanently reclassified as a large area source.

Will transfer machines purchased between 1991 and 1993 have to be replaced with dry-to-dry machines in or prior to September 1996?

No; this change over was required in the original regulations but has since been removed.

What is the status of my separator water in light of this regulation?

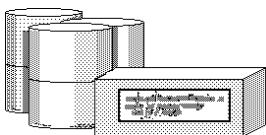
Separator water may be hazardous if it contains solvents. It may be reused (which is the preferred choice), recycled, or discharged into a sewer connected to the Theresa Street Wastewater Treatment Plant. To discharge this water into the sewer, you must obtain permission from Lyle Christensen, (402) 441-7961.

Never discard separator water by pouring it into a septic system, into the trash, or onto the ground. These actions are illegal.

What do I need to know about special wastes?

The LLCHD administers a Special Waste Inventory and Permit program for nuisance wastes, potentially hazardous wastes, or wastes that are otherwise regulated and that are transported to the landfill or waste water treatment plant.

The special wastes typically associated with dry cleaning are (numbers refer to the Special Waste Type):



- 14—containers over 5 gallons in size, except those with both ends removed (for example, perc containers)
- 15—empty containers labelled “Danger” (for example, containers from spotting compounds)

17—solvents, degreasers, strippers, or thinners (for example, perc or stoddard solvent)

18—Refuse containing degreasers, solvents, strippers, or thinners (for example, trap sludge or muck)

No permit is required for wastes that are recycled or sent to a hazardous waste facility such as a solvent recovery service. If you have questions about waste disposal, call the LLCHD Special Waste Program at 441-8040.

Do I need to use a manifest if I ship my waste off-site for disposal or recycling?

A manifest is required for shipment of hazardous waste off-site by all small quantity generators (SQGs)* and large quantity generators (LQGs)†, even if the waste is recycled. Conditionally exempt small quantity generators (CESQGs)‡ are not required to use a manifest.

* A small quantity generator (SQG) is a business that generates more than 220 pounds but less than 2200 pounds of hazardous waste per month.

† A large quantity generator (LQG) is a business that generates 2200 pounds or more of hazardous waste per month.

‡ A conditionally exempt small quantity generator (CESQG) is a business that generates less than 220 pounds of hazardous waste per month and accumulates no more than 2200 pounds.

I am a CESQG. When do I need to send my solvent waste off-site?

A CESQG may accumulate up to 1000 kg (approximately 500 lbs) of hazardous waste before it must be sent off-site to a recycler or hazardous waste facility.

When am I liable or responsible for waste?

The generator of hazardous waste is always liable for any waste produced. This rule is one reason P2 makes so much sense for a business like yours. By reducing the amount of waste businesses generate, owners reduce their liability. Waste should be reduced, reused, or recycled whenever possible; it should only be incinerated or disposed of if there is no other alternative. For information about these options, call the LLCHD Technical Assistance Program at 441-8040.

Can I mix different types of waste?

The mixing of wastes is discouraged. If you mix a hazardous waste with a nonhazardous waste, the whole mixture becomes hazardous. You have increased the amount of hazardous waste and your disposal costs. If in doubt about mixing types of hazardous wastes, contact your disposal contractor to find out if they prefer to keep them separate, or call the LLCHD to identify any risks that mixing the wastes might pose.



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