

Preparation Checklist for Yearly Part 232.16 Dry Cleaning Compliance Inspections

The NYS Department of Environmental Conservation suggests you use this checklist to help you prepare for your inspection. It can help you avoid a lot of problems.

Documents to get together in one place and have on-hand in the shop:

- NYS Air Facility Registration **or** NYS Air Facility Permit **or** NYS Title V Air Facility Permit
- All Owner/Manager and Operator Certificates (make sure none have expired)
- Information on Building owner (name, address, phone #)
- Make sure your DEC Part 232 posting notice (sign) is displayed in a conspicuous place where your customers and the public can read it.
- Make sure all equipment manuals (manufacturer's, or other) are available.
- Information on when your machine(s) were installed: invoices, bills-of-sale, work orders.
- Perc purchase invoices.
- Hazardous waste shipment records; wastewater treatment unit maintenance records.

Cleanliness:

- Clean up your facility, especially around your machine (no Perc-contaminated rags, filter fuzz or lint lying around)
- all solvent containers and containers where Perc-contaminated items are kept are covered and sealed.

Record-keeping:

All the following records must be maintained on site, be current, accurate and complete on the DEC checklists:
(make sure records are completed by Certified Operators, and make sure your records go back five years)

- Part 232 Weekly Leak Inspection Checklist (232-2 – make sure the instrument that you use to check the dry cleaning system for Perc leaks is handy and is in good working order)
- Weekly Operation and Maintenance Checklist (232-2)
- Emergency Preparedness Checklist (232-2)
- Emergency Response/Corrective Action Log (232-3)
- Equipment Maintenance Log (232-4)
- Operation and Maintenance Checklist (232-8)
- Date of most recent drying sensor maintenance
- Hazardous Waste Management Log (232-5)
- Perc Usage Log (232-6)
- Strip the large Carbon Absorber of your fourth generation machine's Secondary Control System as per manufacturer's recommendations at least 24 hours before the inspection, or at time recommended by the manufacturer.**

Vapor Barrier:

- Make sure the vapor barrier door is closed at all times.** If the inspector sees it open, it is a violation and **you will be fined!**
- All visible joints and seams are sealed except for make-up air and exhaust openings and entry doors. Many Vapor Barrier/Room Enclosures are five or more years old and show wear and use-related damage which may be a violation. Take the time to seal all chips, gaps, and cracks which may have occurred - and , if you have an epoxy coated floor (or walls, etc.) be sure that there are no peeling or flaking, leaks or cracks. Repair them a week or more ahead of the inspection date.

Wastewater Management:

- Carbon cartridges, used for carbon filtration associated with wastewater treatment, have been replaced in accordance with manufacturer's recommendations, and you have records to prove this.
- If you don't treat wastewater on-site, and you collect and haul away your wastewater as a Hazardous Waste have available for inspection and verification the Hazardous Waste Shipping receipts (manifests) from your licenced waste hauler.

Containment:

- For machines installed prior to May 15, 1997, make sure floor drains and flooring in the vicinity of the dry cleaning machine(s) have been sealed;
- For machines installed prior to May 15, 1997, be sure that temporary dikes, berms and containment devices have been placed in areas where spills are likely to occur;
- Have adequate Preparedness and Prevention Equipment available for inspection [see §232.8(7)];
- Have supply of absorbent material for spill containment available;
- Have vapor proof containers for storing spill-contaminated material available;
- Have fire control equipment available and in working order with current inspection tag;
- Make sure aisle space around dry cleaning equipment is adequate for inspection of the dry cleaning equipment;
- Have spare parts (gaskets, etc.) for equipment repair available for viewing by inspector;
- Make sure all parts of the dry cleaning system are closed (e.g. doors, filters, stills, etc.);

Leak Inspection – Dry Cleaning System: Do leak a leak-check and make repairs and take corrective action procedures for your facility BEFORE the inspection. Tag leaks if you can't fix them in time for the inspection. Using your Halogenated-Hydrocarbon Detector – “BEEPER” – inspect the dry cleaning system and other areas listed below for liquid and vapor leaks **while the machine is operating** with a load of at least 80% of capacity. Take leak measurements holding the tip of the BEEPER approximately ½ inch from the source. If an untagged leak is discovered, **TAG IMMEDIATELY** and follow the Part 232.7 leak repair requirements.

Leak-check and inspect all components listed below if they are part of the machine. Additional components of the dry cleaning system not specifically listed must be inspected and tagged if found to be leaking. All leaks must be recorded on the checklist.

- Hose and pipe connections, fittings, couplings and valves
- Door gaskets and seatings
- Filter gaskets and seatings
- Pumps, muck cookers, stills, exhaust dampers, diverter valves, button and lint traps, solvent filters or purification systems
- Other machine components containing Perc and/or Perc vapor not specifically listed above
- Solvent tanks and containers, including any with used, spent solvent
- water separators
- dip tanks and drying cabinets (if used)
- pressing stations
- Perc supply containers or systems
- Perc contaminated waste storage drums
- Perc contaminated materials or items
- general exhaust vent in mixed-use settings
- around your wastewater treatment unit while it is operating (if you have one)

Machine Compliance Monitoring (optional, if you have the appropriate measuring devices):

- For 4th Generation Machines and 3rd Generation Machines retrofitted to Fourth, measure the Perc concentration in the machine drum upon opening the loading door at the end of the cycle. Take the measurement near the rear of the drum above the clothes. Use a colorimetric detector tube designed to measure a concentration of 300 PPM Perc to an accuracy of ± 25% of reading. Measured value should be well below 300 PPM.
- For 3rd and 4th Generation Machines only, measure the temperature of the Perc vapor stream on the outlet side of a refrigerated condenser. The temperature sensor should be designed to measure a temperature of 45° F to an accuracy of ± 2° F.
- If the machine is equipped with a loading door-fan, measure the inward velocity of the door fan at the center of the door opening. Minimum inward velocity should be 100 feet per minute (FPM).
- If equipped with a door-fan, the local exhaust system must use a carbon adsorber to control Perc emissions to the air. Make sure you are following the manufacturers recommended regeneration or canister replacement frequency and keep written records to document your activities.