

Perchloroethylene Dry Cleaners

Revised 2-13-04

Checklist of Requirements for Existing Small 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.

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 registered 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>.

_____ Pollution control equipment (refrigerated condenser or carbon adsorber) is not required. If the dry cleaning machine was originally manufactured using a refrigerated condenser or carbon adsorber, this equipment still must be used and operated.

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 two weeks 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 calculation 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', form 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 registered letter to 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.