



Environmental Protection Agency
Office of Environmental Enforcement (OEE)

Best Practice Guidelines for Dry Cleaning

Issued to support
European Union (Installations and Activities using Solvents) Regulations 2012 (S.I. 565 of 2012)

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New Requirements of the 2012 Regulations:

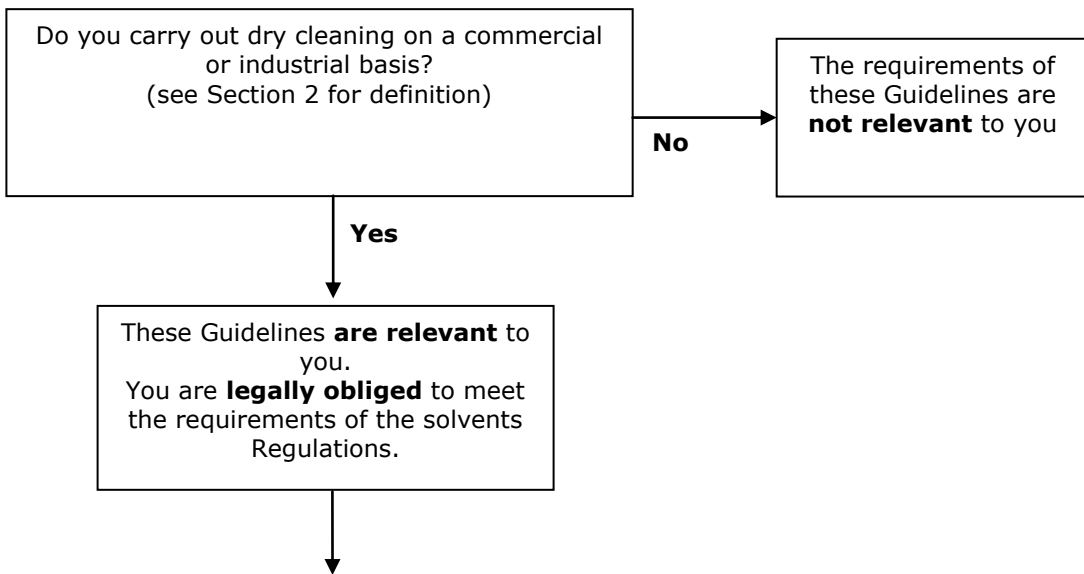
- You must obtain a Certificate of Compliance from your Local Authority (previously known as a Certificate of Approval); the duration of your certificate will depend on your previous compliance history, with the maximum duration being 3 years. It is worth noting that there is no automatic entitlement to receive a 3 year certificate for any operator; the duration of the certificate is determined by your historical compliance (See Section 5).
- You must submit a compliant Assessor's report completed by an EPA approved assessor (previously known as an accredited inspection contractor AIC). See www.epa.ie for the current panel of approved assessors.
- You must submit a report to your Local Authority by the 31st January each year. The first annual report is due to be submitted to your Local Authority by the 31st January 2015 which will cover the 2014 reporting year. If during your current certification period, you do not submit a report on an annual basis to your Local Authority by the 31st January deadline, you will not be entitled to apply for renewal of your certificate of compliance on expiry. You will not be allowed to continue dry cleaning until you hold a current certificate of compliance (See Section 5.10 & Appendix 3a).
- In the case of an operator whose certificate has lapsed, such operators will only receive a certificate of a two year duration commencing on the date of expiry of their last certificate. The operator in this case cannot renew their expired certificate and will have to apply to their Local Authority to obtain a new certificate of compliance. In this case the fee payable to the local authority for a new certificate is €70 rather than €50 for a renewal.

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Overall Summary of the Guidelines' Requirements

To find out if the guidelines are relevant to you,
answer the following:



What you must do:

- Register with your Local Authority: (see Section 5)
- Determine if any substantial changes to the installation have occurred (see Section 3)
- Obtain a certificate of compliance from your Local Authority: (see Section 5)
Display your Certificate in a prominent location at your premises
- Submit an annual report to your Local Authority (see Section 5.10)
- Meet an emission limit value (ELV) (see Section 6)
- Demonstrate compliance with the ELV to your Local Authority by drawing up a solvent management plan and getting an approved assessor to inspect your operation; and meet the requirements of Section 9 as appropriate (see Section 9)

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SECTION 1: INTRODUCTION

These Guidelines have been developed to help implement a European Directive on reducing emissions of volatile organic compounds (VOCs) to the air from the consumption of organic solvents¹. The Directive has been brought into effect in Ireland through Regulations published in December 2012².

The Directive was drawn up because solvent emissions can have harmful effects on human health and the environment. Dry cleaning is just one of the many types of businesses to be affected by the Directive.

1.1 What are solvents and VOCs?

In dry cleaning a solvent called perchloroethylene is mainly used to clean textiles/clothing. Perchloroethylene, or perc as it is commonly called, is a solvent that is used to dissolve dirt and remove it from the clothes. Perc is also a volatile organic compound (VOC), i.e. a chemical that has a tendency to evaporate under ambient conditions. The Directive definitions for each of these terms are outlined below.

Organic Compound
(Directive definition):

any compound containing at least the element carbon and one or more of hydrogen, halogens, oxygen, sulphur, phosphorus, silicon or nitrogen, with the exception of carbon oxides and inorganic carbonates and bicarbonates

Volatile Organic Compound (VOC) (Directive definition):

any organic compound having at 293.15 K a vapour pressure of 0.01 kPa or more, or having a corresponding volatility under the particular conditions of use.

Organic Solvent
(Directive definition):

any VOC which
is used alone or in combination with other agents, and without undergoing a chemical change, to dissolve raw materials, products or waste materials,
or is used as a cleaning agent to dissolve contaminants,
or as a dissolver,
or as a dispersion medium,
or as a viscosity adjuster,
or as a surface tension adjuster,
or a plasticiser,
or as a preservative.

1.2 What will the legislation mean for me?

If you are involved in dry cleaning you are legally obliged to meet the relevant requirements of the solvents Regulations which are outlined in these Guidelines.

¹ European Parliament Directive 2010/75/EU of 24th November 2010 on Industrial Emissions.

² European Union (Installations and Activities using Solvents) Regulations 2012 (S.I. 565 of 2012)

SECTION 2:

SECTOR COVERED BY THE GUIDELINES

The activity covered by these Guidelines is dry cleaning, which is the use of organic solvents, principally perc (perchloroethylene), to clean clothes, textiles, furnishings and other similar items.

There are generally two types of dry cleaning operation. The first involves commercial premises providing a dry cleaning service to the consumer. The second is dry cleaning carried out as part of an industrial activity, usually companies offering textile rental to business and industry. The former accounts for the majority of dry cleaning operations, as many of the latter are changing to conventional laundry services. There is one application which is not covered by these Guidelines – using solvent to manually remove stains and spots in the textile and clothing industry.

In general, the dry cleaning process can be divided into five steps:

1. cleaning in solvent
2. spinning to extract solvent
3. drying with hot air and recovery of solvent
4. deodorisation
5. regeneration of used solvent after the clothes have been cleaned.

Two main types of machine are in use:

- ♦ open-circuit machines - deodorisation of the clothes takes place with venting of drying air to atmosphere;
- ♦ closed-circuit machines - solvent is condensed from the drying air inside the machine and there is no general venting. Some closed-circuit machines have integral water-cooled or refrigerated condensers, while newer versions have integral activated carbon adsorption in addition to the refrigerated condensers.

If you are still unsure as to whether your operation involves dry cleaning, the Directive definition is given below.

Dry cleaning (Directive definition):

any industrial or commercial activity using VOCs in an installation to clean garments, furnishing and similar consumer goods with the exception of the manual removal of stains and spots in the textile and clothing industry

See Section 8 for a list of the emissions to air, water, and waste from the dry cleaning sector, and the sources of such emissions.

SECTION 3: SUBSTANTIAL CHANGE TO INSTALLATIONS

If you are an existing installation and you make what is called a **substantial change** to your installation, the part of the installation which undergoes the change must either:

- be treated as a new installation, or
- be treated as an existing installation, provided that the total emissions of the whole installation do not exceed those that would have resulted had the substantially changed part been treated as a new installation.

A substantial change for installations covered by these guidelines is where there:

- is an increase of more than 25% in emissions of VOCs under Schedule 2 (those that have a solvent consumption of less than 10 tonnes/year – see Appendix 1 for definition of “consumption”).
- is an increase of more than 10% in emissions of VOCs from all other installations to which the Regulations apply (those that have a solvent consumption of 10 tonnes/year or more – see Appendix 1 for definition of “consumption”).

Also the Local Authority can decide a change is a substantial change if it considers it may have significant negative effects on human health or the environment.

SECTION 4: SUMMARY OF LEGAL REQUIREMENTS

This section of the Guidelines gives an overview of the legal requirements of the legislation.

The following table summarises the requirements, and refers to the relevant pages of the Guidelines for more information on each area.

Legal Requirements under the Directive and its implementing Irish Regulations

If you are a dry cleaning installation, you are legally required to:

- Be Registered with your Local Authority (see Section 5.2)
- Hold a valid Certificate of Compliance issued by your Local Authority (Section 5)
Display your Certificate in a prominent location at your premises
- Submit an annual report to your Local Authority (see Section 5.10)
- Meet an emission limit value (ELV) (see Section 6)
- Demonstrate compliance with the ELV to your Local Authority by drawing up a solvent management plan and getting an approved assessor to inspect your operation; and meet the requirements of **Section 9** as follows:
 - o Solvent Containment
 - o Safe Disposal of Solvent Containing Waste
 - o Training
 - o Documented Maintenance Records

Note: while considering the implications of these guidelines for your operation you could also give consideration to relevant requirements under health and safety legislation such as the Safety, Health and Welfare at Work (Chemical Agents) Regulations 2001 (Statutory Instrument No. 619 of 2001).

SECTION 5: REGISTRATION WITH YOUR LOCAL AUTHORITY & CERTIFICATES OF COMPLIANCE

As a dry cleaning installation you are legally required to register with your Local Authority and obtain a certificate of compliance.

5.1 Details for registration and obtaining a certificate of compliance

NEW (OR SUBSTANTIALLY CHANGED) INSTALLATIONS must be registered before commencement of operation and must obtain a certificate of compliance before commencement of operation. For new installations, certificates of a maximum duration of 2 years only will be issued until such time as the compliance history of the site can be established. *You will not be allowed to start dry cleaning until you obtain this certificate.*

EXISTING INSTALLATIONS must be registered and hold a valid certificate of compliance. You will not be allowed to continue dry cleaning without this certificate.

EXPIRED CERTIFICATES: In the case of an operator whose certificate has lapsed, such operators will only receive a certificate of a maximum two year duration commencing on the date of expiry of their last certificate. The operator in this case will have to apply to the local authority to obtain a new certificate of compliance; renewal of the old certificate is not possible at this stage. In the case of an expired certificate, the fee payable to the local authority for a new certificate is €70 rather than €50 for a renewal.

5.2 How do I register?

Registration involves submitting the following to your Local Authority:

- the application details, as set out in the 2012 Regulations³ and repeated in Appendix 2 of these Guidelines.
- a report by an approved assessor on compliance (or otherwise) with the Regulations. This is called an Assessor's Report (see below).
- a fee of €70.

Contact your Local Authority environment section to find out the procedure for registration.

5.3 What is the Assessor's report?

It is important to understand that this is a new approach – the onus is on you to get inspected at least every three years by an Approved Assessor in advance of expiry of your current certificate and to allow the local authority time to issue the revised certificate. The Local Authority will not be carrying out the inspections themselves.

You will need to get an Approved Assessor to review your operation and produce a report on your compliance (or otherwise) with the Regulations. This is called an Assessor's Report. The cost of having the report prepared must be borne by you.

The report sets out whether or not your facility complies with the requirements of these Regulations, i.e. if your installation is meeting the Emission Limit Value (ELV) (see section 6). This is done using the solvent management plan (see Section 7).

Inspections with Approved Assessors can be arranged up to three months in advance of expiry of your current certificate.

³ Schedule 7 to the European Union (Installations and Activities using Solvents) Regulations 2012 (S.I. No. 565 of 2012).

The Approved Assessor used to prepare the Report must be appointed by the EPA for the conduct of inspections to the European Union (Installations and Activities using Solvents) Regulations 2012 (S.I. No. 565 of 2012).

The report will state why/if compliance is not achieved (major non-compliances). The Approved Assessor report will also in any event list any minor non-compliance or any observations.

5.4 How often must an Assessor's report be submitted?

An Assessor's report must be submitted on application, and thereafter at the interval specified by your Local Authority but **at least every three years in advance of expiry of your current certificate** or more frequently if your certificate is for a shorter duration. A fee of €50 must be paid to the Local Authority every time a report by an approved assessor is submitted.

A report by an approved assessor must also be submitted if a substantial change is proposed (see section 3 for a definition of substantial change). A new certificate of compliance must be obtained before operating the substantially changed facility.

Inspections with Approved Assessors can be arranged up to three months in advance of expiry of your current certificate.

5.5 What must I do before getting an approved assessor?

You will need to do a certain amount of work before you bring an approved assessor in to inspect your premises. You will need to gather certain information and use this information to prepare a solvent management plan. For a list of the information you must gather see Appendix 3.

For information on how to prepare the solvent management plan see section 7. A spreadsheet has been developed (see www.epa.ie) with record sheets that can be maintained by you on computer or can be filled in on paper. The spreadsheet helps prepare the solvent management plan for you. These record sheets contain all the record keeping you will need to show compliance or otherwise with the emission limit value (ELV).

Section 9 outlines other mandatory requirements which you must implement covering handling of solvent waste, containment of solvent, records of training, and records of any maintenance.

5.6 What will the Approved Assessor look for on the day of inspection?

The approved assessor may ask for your solvent management plan documentation in advance of the day of the inspection.

On the day of the inspection, the assessor will:

- review the solvent management plan that you have compiled (as noted already, the assessor may ask for this in advance).
- look at each of the figures listed in Appendix 3.
- carry out spot checks on the back up documentation for these figures (e.g. invoices, waste certificates of disposal, etc.).
- tour areas of the premises relevant to the dry cleaning operation – the dry cleaning machine(s), fresh solvent storage areas, waste solvent storage areas, etc.
- may interview employees – e.g. dry cleaning machine operator.
- review any other back-up documentation – e.g. dry cleaning machine manual.

It may be the case that a follow up visit is required – this depends on the outcome of the inspection and the judgement of the assessor. Refer to www.epa.ie for a copy of the report template.

5.7 Where can I find an approved assessor?

The EPA maintains a list of approved assessors on its website www.epa.ie).

5.8 What is the certificate of compliance?

You cannot start up a new (or substantially changed) installation without a certificate of compliance. Your Local Authority must issue you with a certificate of compliance within 28 days of receiving your report by an approved assessor, once it is satisfied that you are in compliance with the Regulations.

After obtaining the certificate you must operate in accordance with the Directive and Regulations. This includes displaying your Certificate in a prominent location at your premises

If the Local Authority considers that the Regulations are not being complied with, it will notify you of its refusal to issue a certificate. Enforcement of the Regulations is a matter for the local authority.

5.9 How long is the certificate of compliance valid?

The certificate is valid for the interval specified by your Local Authority with ***the maximum period being three years***. You must submit a report by an approved assessor to your Local Authority to obtain a new certificate. ***It is worth noting that there is no automatic entitlement to receive a 3 year certificate for any operator; the duration of the certificate is determined by previous compliance history.*** Good compliance would likely to be rewarded by a 3 year duration certificate. In the case of new installations, certificates of a maximum duration of 2 years only will be issued until such time as the compliance history of the site can be established. In the case of an operator whose certificate has lapsed (poor compliance), such operators will only receive a certificate of a two year duration commencing on the date of expiry of their last certificate. The operator in this case will have to apply to the local authority to obtain a new certificate of compliance; renewal of the old certificate is not possible at this stage. In this case the fee payable to the local authority for a new certificate is €70 rather than €50 for a renewal.

5.10 Annual Reporting to your Local Authority

By the 31st January each year, you are required to supply your local authority with data, enabling the local authority to verify the compliance of the installation during the previous calendar year. If you do not submit an annual report to your Local Authority by the 31st January, you will not be entitled to apply for renewal of your certificate of compliance on expiry. **A report template has been provided in Appendix 3a** to allow you carry out this requirement. You will be required to report your total emission value for your installation for comparison with the Total Emission Limit Value (ELV) (see Section 6 below). The local authority may require you to include a solvent management plan prepared in accordance with Schedule 7 or if requested, a report prepared by an approved assessor.

SECTION 6: EMISSION LIMIT VALUE (ELV)

As a dry cleaning installation you are legally required to meet an emission limit value (ELV).

6.1 The Emission Limit Value – what is it?

The emission limit value (ELV) sets the maximum amount of solvent that you are allowed emit from your installation:

Total Emission Limit Value (ELV) for Dry Cleaning Installations
--

20 g solvent emitted per kg of product cleaned and dried
--

Where,

'product' means clothes, garments, furnishings or other similar items;

'emitted' means solvent that escapes to the air in vapour form. It does not include any solvent that is captured in liquid form and reused, or taken off the premises for recovery/recycling or disposal.

6.2 How do I find out if I am meeting the Emission Limit Value?

You are legally required to meet the emission limit value (ELV) from the date specified in section 4. You need to find out if you are meeting the ELV and you also must be able to prove to your Local Authority via the report by an approved assessor that you are in compliance. The way to do this is to make a solvent management plan (see section 7). A spreadsheet has been developed (see www.epa.ie) with record sheets that can be maintained on computer or can be filled in on paper. The spreadsheet helps prepare the solvent management plan for you. These record sheets contain all the record keeping you will need to show compliance or otherwise with the emission limit value (ELV).

In order to compile the solvent management plan you will need to gather certain information - see Appendix 3.

Section 9 outlines other mandatory requirements which you must implement covering handling of solvent waste, containment of solvent, records of training, and records of any maintenance.

6.3 What do I do if I am above the Emission Limit Value?

By comparing the emission limit value with current actual solvent emissions (as calculated by the solvent management plan) you will see if a reduction in emissions is needed, and by when (see section 7.4).

If a reduction is required see section 10 for the various techniques and technologies that can be used to reduce emissions. These include improving operating practices as well as add on equipment.

6.4 Emissions to Sewer/Water

Best practice is not to discharge separator water to sewer or to waters and instead collect it for off-site licensed reclamation or disposal as hazardous waste, as appropriate (you should contact your sanitary authority re any discharges).

SECTION 7: SOLVENT MANAGEMENT PLAN

7.1 Solvent Management Plan - What is it?

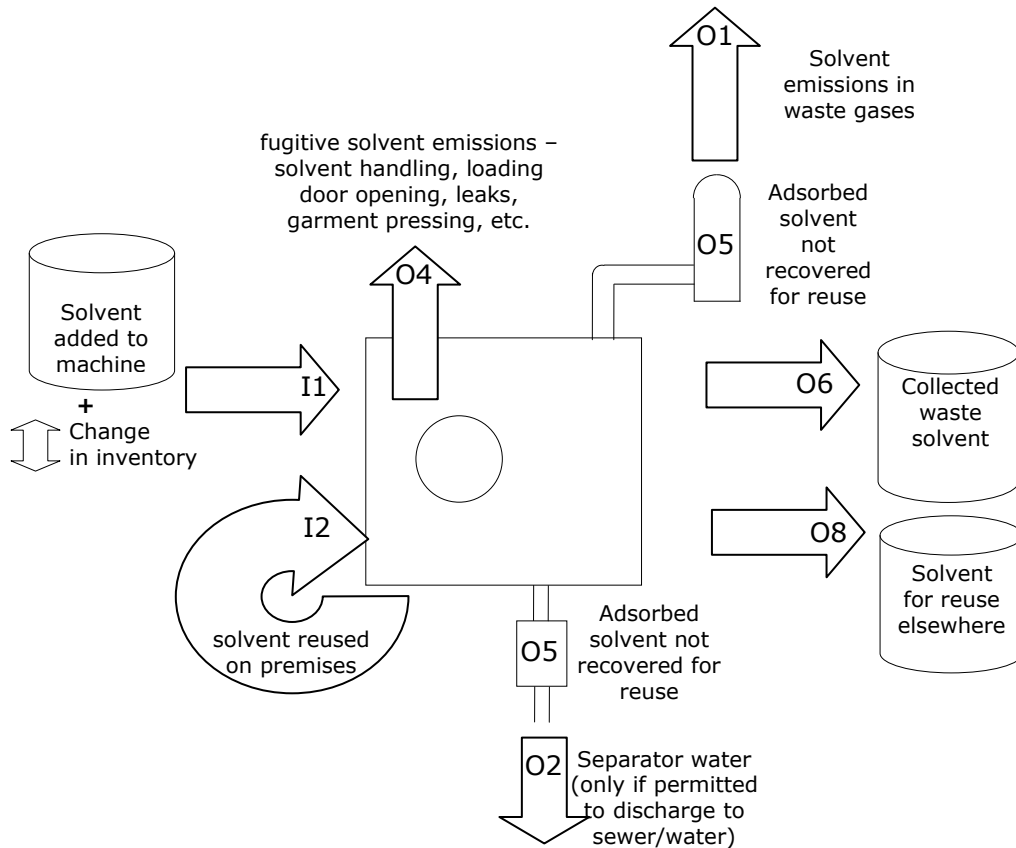
The solvent management plan basically works out where all of the solvent you use eventually ends up. The reasons for making a solvent management plan are:

- to find out if you are complying with the emission limit value.
- to demonstrate to the approved assessor and the Local Authority that you are/are not in compliance with the emission limit value.
- to help you identify future emission reduction options (and help reduce your costs).

The solvent management plan uses what is called a 'mass balance', basically identifying where solvent goes into a process and where it comes out. It can be done for an individual dry cleaning machine or for the entire dry cleaning premises.

7.2 Solvent Management Plan Terms for Dry Cleaning

The following drawing and subsequent table list the solvents Directive terms used in the mass balance for dry cleaning installations.



The meaning of each mass balance term is as follows. Those that are relevant to the dry cleaning sector are highlighted in ***bold italics***:

Directive's Mass Balance Terms		Relevance to Dry Cleaning
Inputs of organic solvents (I):		
I1	<i>The quantity of organic solvents or their quantity in preparations purchased which are used as input into the process in the time frame over which the mass balance is being calculated</i>	Relevant. The amount of solvent put into the machine for the first time.
I2	<i>The quantity of organic solvents or their quantity in preparations recovered and reused as solvent input into the process. (The recycled solvent is counted every time it is used to carry out the activity)</i>	Relevant to the process of dry cleaning, although not used in the calculation, hence can be ignored. The amount of solvent used in a year, counting it every time it is recovered and reused within the machine.
Outputs of organic solvents (O):		
O1	<i>Emissions in waste gases</i>	Relevant. The amount of solvent emitted from the machine that isn't captured by the condensers or adsorbers.
O2	<i>Organic solvents lost in water, if appropriate taking into account waste water treatment when calculating O5</i>	May be relevant, but only if sanitary authority permits separator water discharge to sewer/water.
O3	The quantity of organic solvents which remains as contamination or residue in products output from the process	May be relevant, but the amounts involved will be very small due to pressing/ironing and in any case the solvent will inevitably be emitted to air.
O4	<i>Uncaptured emissions of organic solvents to air. This includes the general ventilation of rooms, where air is released to the outside environment via windows, doors, vents and similar openings.</i>	Relevant to dry cleaning. Includes leaks, emissions from opening doors, solvent handling, etc. (see Section 8).
O5	<i>Organic solvents and/or organic compounds lost due to chemical or physical reactions (including for example those which are destroyed, e.g. by incineration or other waste gas or waste water treatments, or captured, e.g. by adsorption, as long as they are not counted under O6, O7 or O8)</i>	Only adsorption is relevant. May not be relevant for every facility. Applicable to solvent removal from air or separator water. Does not include adsorbed solvent that is regenerated and reused within the dry cleaning machine.
O6	<i>Organic solvents contained in collected waste</i>	Relevant – waste solvent itself plus solvent in filters, etc. Also separator water if it is handled as hazardous waste.
O7	Organic solvents, or organic solvents contained in preparations, which are sold or are intended to be sold as a commercially valuable product	Not relevant.
O8	<i>Organic solvents contained in preparations recovered for reuse but not as input into the process, as long as not counted under O7</i>	Any waste sent away for recovery/recycling rather than disposal. May not be relevant to every dry cleaning facility.

09	Organic solvents released in other ways	Not relevant.
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7.3 Keeping Records – the Excel Spreadsheet

In order to carry out the solvent management plan, you will have to start keeping records on a regular basis to help you generate the information you require. An example of the type of records that can be kept are contained in the separately available excel spreadsheet (see www.epa.ie). These record sheets can be maintained on computer or there is a version of the records for filling in on paper. These record sheets contain all the record keeping you will need to show compliance or otherwise with the emission limit value (ELV). Appendix 3 gives a summary list of the information you will have to obtain and keep on record.

Within this set of records, there is a weekly record sheet which should be filled in on an on-going basis by hand, regardless as to whether the overall records will be kept on computer or on paper. The best place to keep this weekly record sheet is attached to the machine itself (or one on each machine where there is more than one in operation).

The other summary record sheets can be filled in by hand or on computer on an on-going basis. You can modify these sample record sheets to suit your own requirements.

A set of records for a 12 month period must be compiled before you have your first inspection. This does not have to be a calendar year. Give regard to the relevant dates by which certificates must be obtained in Section 4 in order to commence timely record keeping, taking into account the time required to have an inspection by an approved assessor performed, an assessor's report compiled, and for the Local Authority to process your registration.

7.4 Getting Information for the Solvent Management Plan Terms

Appendix 3 gives a summary list of the information you will have to obtain and keep on record. The excel spreadsheet provides more detail on how to obtain this information. A summary for each of the mass balance terms is as follows:

11 The quantity of organic solvents or their quantity in preparations purchased which are used as input into the process in the time frame over which the mass balance is being calculated

This term is calculated based on the records of the volumes of perc added to the dry cleaning machine. The start and end of year levels of solvent in the machine and in any fresh containers are also taken into account. The amount of perc purchased during the period is used as a cross check.

***01 Emissions in waste gases
and***

04 Uncaptured emissions of organic solvents to air. This includes the general ventilation of rooms, where air is released to the outside environment via windows, doors, vents and similar openings.

Air emissions are calculated by difference using the solvent management plan (see Section 7.5).

02 Organic solvents lost in water, if appropriate taking into account waste water treatment when calculating 05

Relevant if the sanitary authority permits discharge of separator water. Analysis of perc content of separator water is required (this may need to be repeated on a periodic basis). An estimate of the annual quantity of separator water generated is required (see excel spreadsheet for method). Waste water treatment equipment, if in use, should be taken into account. N.B. Machine operation and maintenance must be of good standard to ensure that only permitted quantities of perc are lost in water.

05 Organic solvents and/or organic compounds lost due to chemical or physical reactions (including for example those which are destroyed, e.g. by incineration or other waste gas or waste water treatments, or captured, e.g. by adsorption, as

long as they are not counted under O6, O7 or O8)

This term is only relevant for carbon adsorption where the carbon is not regenerated in-situ. Calculated based on the weight of disposed carbon and an estimate of its perc content. Covers adsorption of solvent from air and from separator water. Also may be relevant for any solvent remaining on disposed carbon from filters used to remove colour from the perc liquid.

O6 Organic solvents contained in collected waste

and

O8 Organic solvents contained in preparations recovered for reuse but not as input into the process, as long as not counted under O7

Records of the weight of waste sent off-site should be maintained. If there is no record of disposal of the waste by an authorised outlet, no credit will be allowed for the waste.

Analysis of perc content of waste is required (this may need to be repeated on a periodic basis). This should ideally be obtained in mg/kg rather than mg/litre. Representative sampling methods should be used (see Appendix 4).

If separator water is handled as hazardous waste, analysis for perc content and quantification of volumes is also required.

Disposal is where such waste is sent for destruction, while recovery is where such waste is recovered off the premises for recycling or reuse in another application. For dry cleaners, the distinction between waste being sent for recovery or for disposal does not have an effect on the solvent management plan since there is no threshold for dry cleaning and so the "consumption" term is not critical.

Weight of product processed

The overall emission limit value is expressed in terms of emissions per unit product processed. Hence a total for product processed in the time period is required. This is based on records of the weight of each load of product. It is suggested that a digital and calibrated scales (e.g. bathroom scales) be used for this purpose.

7.5 The Solvent Management Plan Calculation

The solvent management plan calculates actual emissions for the year using the above terms in the following calculation:

$$\text{Actual emissions: } (O1 + O4) = I1 - (O5 + O6 + O8)$$

Or using the meanings of these terms:

Actual emissions:

$$[(\text{emissions from waste gases}) + (\text{fugitive emissions})] = (\text{quantity of solvent purchased \& used}) - [(\text{any solvent adsorbed \& not recovered}) + (\text{solvent in collected waste for disposal}) + (\text{solvent collected for recovery/recycling/reuse elsewhere})]$$

The excel spreadsheet performs this calculation automatically. If using the paper version of the records, instructions are provided.

7.6 Comparing Actual Emissions with the Emission Limit Value

Once actual emissions have been calculated, the amount of dry cleaning carried out in a year must be taken into account.

The ELV:	To get Actual Emissions use:
20 g solvent emitted per kg of product cleaned and dried	$\frac{(\text{grammes of actual emissions for the year})}{(\text{kg of product processed during year})}$

If the answer you get from the right hand column is bigger than the corresponding value on the left hand column, the emission limit value is being exceeded and emissions will need to be

reduced (see sections 9 and 10). Otherwise, you are operating within the ELV and may proceed to have an approved assessor's inspection/report prepared by the due date.

The excel spreadsheet performs this calculation automatically. If using the paper version of the records, instructions are provided.

SECTION 8: EMISSIONS AND SOURCES

8.1 Air

Emissions to air from dry cleaning and their sources:

Emissions Sources

Solvent vapour	opening access doors – loading door, button trap, still, etc. unloading of clothes, waste gases during deodorising cycle (open circuit machines only), emptying the still residue, filling the machine with solvent, emptying the filter, any leaks from certain parts of the machine & piping, any spills, ironing & steam pressing areas, fresh solvent storage and handling, solvent-containing waste storage and handling, finished goods storage area.
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8.2 Water

Separator Water

Aqueous emissions from dry cleaning consist of water from the water separator. Separator water comes from various parts of the dry cleaning process (carbon adsorber regeneration, still cleaning, liquid detergents, clothes in the drum, etc.). Separator water contains a certain amount of dissolved perc (typically 150 mg/litre which is the saturation level) and can often contain small amounts of free phase perc which settles at the bottom of the separator water container, even where the water separator is automatically operated.

Equipment is commercially available which can treat separator water and further reduce content of perc after the water separator.

Other Emissions

Other sources of emissions not involving solvents may include cooling water (where used and operated on a once through basis rather than in a closed loop), and boiler blowdown (where steam is used).

Accidental Emissions

There are several areas with a potential to contaminate surface water and groundwater via accidental discharge of solvent to drains and sewers. These include the dry cleaning machine itself, the solvent storage area and solvent-containing waste storage area.

8.3 Waste

Hazardous wastes generated from dry cleaning:

Waste	Source
Materials contaminated with solvent	still residue, content of the filter, lint filter, & button trap, spent filter cartridges, spent activated carbon or carbon canisters (air or water treatment, or colour removal), empty containers, used spill kit material, etc.
Waste solvent	Any out of date, contaminated, etc. solvent

SECTION 9: OTHER MANDATORY REQUIREMENTS

Apart from meeting the emission limit value and keeping the necessary records to demonstrate compliance, there are other practices considered mandatory. This section of the Guidelines outlines these practices which must be implemented by dry cleaning installations. These issues will be checked by the Approved Assessor inspector.

9.1 Solvent Containment

The following containment measures should be implemented to prevent solvent escaping to air, water or onto the ground:

- There should be no drains in the vicinity of the dry cleaning machine, the solvent and waste storage areas or any area where solvent is handled which could be affected by an accidental spillage.
 - Keep all containers closed when not in use and during handling/transport around the premises. This includes containers holding waste, containers holding separator water and containers that are half full. Spent cartridge filters (where used) should be stored in sealed bags or sealed containers.
 - Do not use the dry cleaning solvent for any other application, except inside the dry cleaning machines.
 - Keep the number of solvent drums stored to a minimum.
 - Use coloured (usually black) high density polythene drums rather than clear polythene drums.
 - Keep solvent storage drums in an area which:
 - is well ventilated
 - is cool with no sources of heat
 - can be secured against vandals
 - will avoid as much as possible any damage from collisions
 - is away from drains.
- (In Ireland, solvent is stored in drums and small containers - for tank storage requirements see ETBPP 1997.)
- If purchasing a new machine, a spill tray should be obtained.

9.2 Safe Disposal of Solvent Containing Waste

Collected solvent hazardous waste from the still is usually unsuitable for reuse in the machine since it is contaminated with dirt, fibres, etc. In this case it needs to be handled properly and disposed of safely. Records of waste sent off-site must be maintained (such as those in the excel spreadsheet) together with certificates of disposal. These will be open to inspection.

NEVER allow waste solvent enter any drains, sewers or water courses, or be discarded on the ground. NEVER dispose of solvent materials as part of domestic waste.

ALWAYS use a company who has the correct waste licence or waste permit and waste collection permit. Ask for and retain a copy of their waste licence/permit. Under law, you can still be held responsible for your waste, even after you hand it over to someone else.

Off-site hazardous waste incineration

For certain wastes incineration in a hazardous waste incinerator is the only appropriate method of disposal (once all reduction, reuse, recovery, and abatement options have been exhausted).

Such wastes include:

- still residue
- filter contents (lint, dirt, filter aid, etc.)
- lint filter & button trap contents (lint, dirt, etc.)
- waste from water separator cleaning

- spent filter cartridges (where used; equipment supplier may accept these back)
- separator water (if handled as a waste)
- any waste solvent
- other solvent contaminated material (spent activated carbon, rags, etc.)

All such wastes should be stored in closed, labelled containers while awaiting disposal. All such wastes should be taken off the premises only by a licensed contractor.

You should keep a written record of the quantity of all waste solvent sent off-site for disposal.

Water from Water Separator

Separator water should not be sent to drain unless permission to do so has been given in writing by the sanitary authority. You should contact your sanitary authority re any discharges. It is important, even if permission is granted, that no free phase perc is ever sent to drain, for example from any accumulations at the bottom of the container used to collect separator water.

(Best practice is not to discharge separator water to sewer and instead collect it for off-site licensed reclamation or disposal, as appropriate - see Section 10).

It is important that workers are made aware of what the correct practice is in relation to handling separator water. Correct operation of the machine and regular maintenance are vital to minimise perc levels in water.

The waste generated from cleaning the water separator should be collected in a closed container and disposed of by a licensed contractor with other solvent containing waste.

9.3 Training

Maintain training records for all employees involved in the operation of the dry cleaning machine, the handling of solvent, or the handling of the perc containing waste. These records must be open to inspection. Training can be carried out by a competent person in-house – it does not have to be by a third party. Relevant new employees should also receive this training on arrival, be supervised during induction and periodically given refresher training.

The training record documents should include dates of training, what the training consisted of, and the employee names and signatures. These records should be retained on file while the employee remains at these duties and afterwards for at least two years.

The training should include:

- The correct way to operate the dry cleaning equipment, including start-up, shut-down.
- The correct way to carry out routine jobs on the machine, including:
 - operating the still & raking it out.
 - operating the water separator & handling the resulting separator water.
 - cleaning the button trap and lint filters.
 - regenerating the carbon adsorber (if present).
- Solvent handling, loading, unloading, and storage methods.
- Perc containing waste handling.
- What to do in the event of a solvent spill.
- The need to prevent any solvent discharge to sewer, waters, or ground.
- Actions to be taken if a vapour leak is detected.
- Correct use of spotting chemicals.
- Why solvent emissions should be minimised as much as possible.
- Details of the data required to be recorded and maintained for the purposes of Approved Assessor inspections.

The key points in machine operation should be displayed on or near the machine and the machine operating procedures should be readily available to workers.

9.4 Documented Records

Documented maintenance records for the dry cleaning machine should be kept which records the dates any components are repaired or replaced. Maintenance should be carried out by competent persons in accordance with the manufacturer's recommendations. Also all documentation relating to waste transfer, solvent purchases and all other documents should be retained on site for inspection.

SECTION 10: REDUCING EMISSIONS – BEST PRACTICE

This section of the Guidelines outlines the various ways you can reduce your emissions of solvent.

These are described under the headings of load minimisation, containment, recovery, recycling, and abatement, while safe disposal is dealt with in Section 9. This follows the preferred hierarchy of dealing with emissions and waste.

These techniques are considered "Best Practice". They are not requirements of the Regulations, rather they act as a guide as to how the emissions limit value (ELV) might be met. Additionally, minimising the consumption of perc will reduce your costs.

10.1 LOAD MINIMISATION OR SOURCE REDUCTION

'Load minimisation' or 'source reduction' involves reducing the actual amount of solvent in use in the first place. For dry cleaning this includes:

- type of machine
- machine features that reduce emissions at source
- machine operation
- worker training
- regular machine maintenance

Type of Machine

These Guidelines *do not* oblige you to change to a newer machine. However, if you are on the point of changing your machine, you should take note of the following.

Alternatives to Perchloroethylene Dry Cleaning Machines

You could consider alternatives to dry cleaning machines using perc. These include:

- Professional wet cleaning systems (washer, dryer, specialty detergent & injection system, and finishing equipment). Some advantages: eliminates perc and its associated hazards; the legal obligations of these Guidelines would no longer apply; reported lower capital costs; lower energy costs; higher throughput. Some disadvantages: may not be applicable for all 'dry cleaning only' items; a certain level of garment mislabelling has been reported; may require increased training; may require more finishing work; some shrinkage possible without the use of tensioning finishing equipment; and lack of consumer awareness and appropriate care labels (although the ISO 3758 care label standard is being reviewed and will include a new symbol for wetcleaning).
- dry cleaning machines that use carbon dioxide (CO₂) as a solvent. Some advantages: eliminates perc and its associated hazards; the legal obligations of these Guidelines would no longer apply; the CO₂ used is that already generated in other industries, e.g. brewing. Some disadvantages: emissions of CO₂ which is a greenhouse gas; equipment is more expensive; detergents are reported as being more expensive.
- Machines that use a silicone-solvent based material (decamethylcyclopentasiloxane). Some advantages: eliminates perc and its associated hazards; reported similar operating costs. Some disadvantages: requires a licence from suppliers; the legal obligations of these Guidelines still apply since the material is still a VOC (has a vapour pressure above 0.01 kPa at 293.15K); has been reported as not being quite as effective at stain removal.

Change to Closed-circuit Machines

You should make sure any perc machine you purchase is a closed-circuit machine (machines now on the market are closed-circuit machines, apart from some reconditioned second-hand machines). In closed-circuit machines general venting to air during the deodorisation cycle does not take place, but solvent is condensed from the drying air using refrigeration, and often supplemented by carbon adsorption (new machines available today have carbon recovery systems). An open-circuit machine emits about eight times as much solvent as a closed-circuit machine (Entec 1999).

However, it is important to note that just installing a new machine is no good on its own. The various points on proper operation and management are also required. Record keeping is essential.

Any new equipment should be properly installed. Also any new machines should be CE marked to conform to the European standard EN ISO 8230 Safety Requirements for Dry-cleaning Machines using Perchloroethylene.

Machine Features that Reduce Emissions at Source

If you are on the point of changing your machine, you should take note of the following (for some of these items, you may be able to retrofit to an existing machine):

- Use of a loading door interlock device so that the machine will not operate unless the door is closed properly and the door cannot be opened when it is in mid cycle. On new machines available today, all doors are electrically and mechanically locked and cannot be opened during the automatic cycle; if they are interfered with, the machine shuts down.
- use of automatic machine shutdown if any of the access doors are opened (lint filter, the still, button trap, etc.) (see note on previous point).
- use of automatic shutdown after use for the still heat source.
- use of automatic options for some of the more regular jobs, such as discharge of filter contents to the still, still waste pump out directly to the waste container, carbon adsorber regeneration, operation of water separator, washing of still wall using dirty solvent for redistillation, and water separator cleaning (all available on machines currently on the market).
- temperature control of the still.
- use of disc filters (often called eco-filters) rather than cartridge filters.
- self-cleaning lint filters and button traps.
- automatic drying sensors.
- double water separators.
- Use of more than 2 tanks in the machine to cater for light and dark cleaning.
- turbo fan on still to enhance amount of solvent removed.

Machine Operation

The operating manual provided by the manufacturer/supplier should always be followed. The following general guidance on machine operation will help reduce solvent emissions, regardless of machine type:

When machine is idle

- Keep the loading door and all other access doors to the machine closed at all times except when loading and unloading.
- Only add solvent to the machine when it is not running.

Before Start-up

- Turn on the general ventilation system.
- (If using) turn on compressed air and check it is at the right pressure.
- Check that the refrigeration cooling system is operating; or, if applicable, that the cooling water is circulating and is at the right temperature, pressure and flowrate.
- Check that the correct level of solvent is in each tank in the machine.
- Check that the lint filter, dust bag and button trap are all clean.
- Check that the loading door and all other access doors are closed.
- Turn on steam partially, then fully. Check steam pressure is correct.

- Run the machine on deodorise for a few minutes, or run a “good morning programme” if available, to remove any solvent vapour generated overnight before the first loading each day.

Loading and Unloading

- Weigh every load. This will help prevent overloading the machine. In any case this is mandatory for the solvent management plan.
- Do not underload the machine – a partial load will emit almost the same amount of solvent as a full load.
- The only exception to not underloading is bulky items (duvets, blankets, etc.); the machine should be underloaded for this type of bulky load, otherwise the load will not dry properly.
- Take the load to the machine before opening the door.
- Once running, do not open the loading door until the cycle is complete.

Operation

- Use automatic programmes in preference to manual operation.
- Avoid programmes that require opening in mid cycle.
- If entering your own programmes, ensure it ends with a drying cycle of sufficient length.
- Ensure that the setting of the automatic drying control sensor (if present) is set at a level which ensures sufficient drying.

Shutting Down

- Check that the distillation has finished.
- Turn off the steam supply and leave the machine to cool with all doors closed.
- Only when completely cool, turn off electricity, refrigerating system (or cooling water if applicable), any air supply, and local ventilation. If your machine distils overnight, some of these items will have to remain on – check instructions.

Removing Waste Lint

- Waste lint from the lint screen and the button trap should be collected twice daily at the end of a cycle when this lint is in a fully dry state. Dispose of this lint along with other perc-containing waste.

Frequency of Cleaning the Still

- The residues from the still should be cleaned out at least twice a week. This frequency is recommended in order that modern detergents, which are biodegradable, be removed after a short period. Otherwise they can decompose giving a bad smell to the garments.

Removing Still Residue

- make sure the still is empty before opening;
- dry the residue in the still for at least one hour;
- leave the still to cool – it is recommended to wait until the still is 38°C or less, or leave overnight;
- transfer the residue into a closed container;
- make sure the door seal is clean and shut the door properly.

Changing Spent Filter Cartridges (not relevant to modern machines with disc filters)

- Change the filter cartridge once the pressure reaches that specified by the manufacturer (modern disc filters will usually discharge automatically to the still when the set pressure is reached).
- remove the filter contents and put them in the still;

- leave the filter in place to drain overnight;
- in the morning remove the filter and put in a polythene bag;
- put the bag into the machine drum and take the filter out of the bag;
- put the filter through a drying cycle;
- remove the filter and store in a sealed, labelled polythene bag or container.

Worker Training

Worker training will help reduce emissions and waste. See section 9.

Regular Machine Maintenance

The dry cleaning machine should be maintained on a regular basis. A typical maintenance checklist is provided in Appendix 6. Follow the manufacturer's instructions on recommended frequencies for the various maintenance tasks. Suggested maintenance schedules are given in references ETBPP 1997 and USEPA 1994.

Some more recent machines have an automatic maintenance and servicing reminder inbuilt in the computer control system, or even fault diagnostic facilities - these should be utilised if available.

Others

Minimise use of Spotting Chemicals

Minimise as far as possible the amount of spotting chemicals you use prior to dry cleaning.

Solvent Inventory

Keep your stock of solvent as low as is feasibly possible. This will reduce the risk of spills.

10.2 CONTAINMENT

Containment basically means measures that stop the solvent escaping to air, water or onto the ground. Additional measures to those outlined in Section 9 include:

- enclosed solvent loading and unloading
- use of a spill tray
- closed containers
- solvent storage
- spill kit
- leak detection.

Enclosed solvent loading and unloading

When filling the machine with fresh solvent, and unloading spent solvent from the machine:

- transport fresh solvent in a *closed* container to the machine from the storage area.
- Hold small containers of fresh solvent (e.g. 5 litres) inside the drum before opening the cap.
- Use piped gravity feed or pumped feed from the machine to the solvent waste storage container.

Use of a Spill Tray

A spill containment tray for the machine will provide local bunding. Such trays should be designed to hold 110% of the volume of the biggest tank in the machine. Machines available today have integral spill containment trays, either as standard or an optional extra.

Closed Containers

See section 9. Train workers to keep all containers closed when not in use and during handling/transport around the premises. The closed lid should be tight fitting. Transfer material out of containers that do not seal properly, e.g. are damaged or dented.

Solvent Storage

Best practice for solvent storage and waste solvent storage is a 'bunded' area, i.e. any spills while they are stored are collected safely. Bunded pallets which facilitate this are available commercially in various sizes.

In addition limiting access to solvent storage to authorised personnel only would be desirable.

Keep a spill kit

Keep a spill kit nearby to wipe up any significant solvent spillages. These typically contain absorbent materials to wipe up the solvent, pads to cover drains, as well as a container in which to keep the used absorbent material afterwards (to await a drying cycle in the machine or to be disposed). There are various suitable kits available on the market.

Encourage your workers to place any used absorbent materials into the sealed containers. Try to use materials that can be dry-cleaned for wiping up spills, since the solvent can then be recovered. If you use other materials, they will have to be disposed of as hazardous waste.

Appropriate gloves, footwear, and respiratory protection equipment may also be needed for dealing with spills.

Train your workers in the use of this spill kit.

Alternatively if a spill is collected in a spill containment tray, it can be pumped back into the storage tank or the machine.

Leak Detection

One of the main sources of emissions from dry cleaning machines is through leaks that can develop in certain parts of the machine. These leaks start off very small but unchecked will eventually grow to become bigger leaks. A way to tackle this is to carry out a regular leak detection exercise, for example on a monthly basis.

To do this you will need something with which to detect any leaking solvent vapour. An air sampling pump and stain tubes (glass tubes which change colour when perc is detected), portable electronic gas analysers, or leak detection halogen lamps are suitable. Ask your equipment supplier.

Keep a written record of which components were tested and when, including if any leaks were detected.

Carry out the leak detection exercise during the *drying cycle* as this is when any leak will be at its greatest.

Follow the liquid circuit and then the vapour circuit from start to finish, checking for leaks anywhere there is a joint or seal. The parts of the machine that are most likely to develop leaks and which therefore should be included in a detection exercise are as follows:

- all solvent pipe valves and flanges
- all solvent pump seals
- all solvent tank sight glasses
- all machine access doors (loading; still; filter; button trap; air duct inspection)
- the condenser
- filter housing, seals, and dump valve
- carbon adsorber vent

Detected leaks should be repaired as soon as possible.

10.3 RECOVERY AND RECYCLING

Recovery and recycling operations relevant to dry cleaning include:

- condensing the solvent
- filtering the solvent
- distilling the solvent
- adsorbing the solvent and recovering for reuse
- stabilising the solvent
- sending solvent for recycling rather than disposal
- container take back by supplier

Condensing the Solvent

The majority of machines have integral condensing units in place. Those now on the market have water cooled units followed by refrigerated units, while older models had water cooled units only. These condense the solvent vapours mainly from drying, but also from washing, and collect them for reuse within the machine. It is possible to install add on condensers for machines that have no condenser in place, or retrofit water cooled condensers with refrigerated condensers. Condensers should be appropriately sized (see reference SCAQMD 1997 for more information). Water cooled condensers can be operated in a closed loop which can save water usage and charges, although some additional electrical energy will be required.

Filtering the Solvent

Machines have integral filters in place. These are either disc filters (often referred to as "eco-filters") or cartridge filters, which are the older type of filter. Disc filters which do not need any filter aid and can be cleaned without opening are available on machines on the market today. Cartridge filters either use filter aid (diatomaceous earth or silica) or use paper and/or carbon (which can be reused for several hundred cycles). For preference use filters that can be regenerated rather than disposable filters.

The solvent is filtered, usually once a day, to eliminate lint, dirt and other solids that have been removed from the clothes. The collected solids in the filter are also usually removed once per day. They are usually heated in the still to remove as much solvent as possible. Some machines now have automatic filter maintenance.

Distilling the Solvent

The filtered used solvent is usually sent for distillation. The still is usually an integral part of the dry cleaning machine and can be steam or electrically heated. Vapour from the still is condensed and sent to a water separator from which solvent is taken for reuse and returned back to the machine tanks.

Adsorbing the Solvent and Recovering for Reuse

Some machines have integral carbon adsorption units in place. These contain an 'adsorbent', a material to which the solvent vapours become attached. The adsorbent is usually activated carbon, which is like charcoal. These adsorb the solvent vapours that get through the condenser and solvent vapours from the deodorisation stage.

Adsorbents can be regenerated in-situ or the carbon can be periodically replaced when saturated and disposed and replaced by fresh carbon. Adsorbents that are regenerated in-situ and the recovered solvent reused are considered recovery and recycling equipment while those adsorbents which are not regenerated in-situ are considered abatement equipment (see Section 10.4).

For adsorbents regenerated in-situ, the adsorbed solvent is periodically removed from the activated carbon by using a steam-fed heat exchanger or by hot air. The solvent is condensed and passed through a water separator. The collected solvent is returned to the storage tank within the machine for reuse.

Some machines regenerate automatically, while other machines will not continue to operate until the regeneration programme is run when required. The time between generations is usually based on the number of loads that have been processed.

Periodically, even for adsorbers which regenerate in-situ, the carbon will become exhausted and have to be replaced. Such waste carbon should be regenerated before being removed from the machine, and should be disposed of with solvent waste.

It is possible to install add on carbon adsorbers for machines that have no carbon adsorbers in place.

Stabilising the Solvent

Re-stabilise the solvent using a solvent stabilising kit to extend its useful life.

Send Solvent for Recycling rather than Disposal

Depending on quality, collectors of the waste solvent can in certain cases send it for perc recovery from the waste rather than having to send it for destruction.

Container take back by supplier

In some cases, suppliers may accept back their empty solvent containers. The size of orders, size and type of containers, and distance involved are factors in whether this facility is available or not.

10.4 ABATEMENT

Abatement is any piece of equipment that is installed after the dry cleaning machine to treat the solvent emissions in the waste gases after they have been generated – so-called end-of-pipe technology.

Adsorption of Solvent

Where a carbon adsorber is used, but there is no regeneration of the carbon in-situ and collection of the solvent for reuse, it is considered abatement equipment. Carbon adsorbers with in-situ regeneration and reuse of the collected solvent are considered recovery and recycling equipment (see Section 9.3).

After a period of time in operation the carbon becomes saturated, i.e. it cannot adsorb any more solvent. The canister or filter containing the carbon has to be replaced with a new one. It is essential that this is done before solvent emission levels rise. The solvent-containing carbon must be sent off-site for either recovery of the solvent from the carbon or for incineration of the carbon. Such should be handled as solvent containing waste.

It is possible to install add on carbon adsorbers for machines that have no carbon adsorbers in place.

Water Separator & Carbon Filtration

Excess water is periodically removed from the dry cleaning machine using a water separator. Excess water from the water separator should ideally be drained on a daily basis when the machine is idle.

More modern machines have two water separators in place. Latest machines available in the United States also include a carbon filter (or double carbon filters) after these two separators.

There is commercially available equipment which can treat separator water and further reduce content of perc after the water separator. This is usually via phase separation and carbon filtration. Such units can be connected to the dry cleaning machine or can be operated separately.

APPENDIX 1: GLOSSARY

consumption: the total input of organic solvents into an installation per calendar year, or any other 12-month period, less any VOCs that are recovered for reuse.

dry cleaning: any industrial or commercial activity using VOCs in an installation to clean garments, furnishing and similar consumer goods with the exception of the manual removal of stains and spots in the textile and clothing industry.

Emission: any discharge of volatile organic compounds from an installation into the environment.

emission limit value: the mass of volatile organic compounds, expressed in terms of certain specific parameters, concentration, percentage and/or level of an emission, calculated at standard conditions, N, which may not be exceeded during one or more periods of time.

existing installation: in terms of the 2012 Regulations, means an installation that is in operation on or before 1 January 2013.

fugitive emissions: any emissions not in waste gases of volatile organic compounds into air, soil and water as well as solvents contained in any products. They include uncaptured emissions released to the outside environment via windows, doors, vents and similar openings.

Input: the quantity of organic solvents and their quantity in preparations used when carrying out an activity, including the solvents recycled inside and outside the installation, and which are counted every time they are used to carry out the activity;

installation: a stationary technical unit where dry cleaning is carried out, and any other directly associated activities which have a technical connection with the activities carried out on that site and which could have an effect on emissions.

normal operation: all periods of operation of an installation or activity except start-up and shutdown operations and maintenance of equipment;

new installation: in terms of the 2012 Regulations, means an installation that is put into operation on or after 1 January 2013.

Operator: any natural or legal person who operates or controls the installation or, where this is provided for in national legislation, to whom decisive economic power over the technical functioning of the installation has been delegated.

organic compound: any compound containing at least the element carbon and one or more of hydrogen, halogens, oxygen, sulphur, phosphorus, silicon or nitrogen, with the exception of carbon oxides and inorganic carbonates and bicarbonates.

organic solvent: any VOC which is used alone or in combination with other agents, and without undergoing a chemical change, to dissolve raw materials, products or waste materials, or is used as a cleaning agent to dissolve contaminants, or as a dissolver, or as a dispersion medium, or as a viscosity adjuster, or as a surface tension adjuster, or a plasticiser, or as a preservative.

reuse of organic solvents: the use of organic solvents recovered from an installation for any technical or commercial purpose and including use as a fuel but excluding the final disposal of such recovered organic solvent as waste.

small installation: for dry cleaning an installation which has a solvent consumption of less than 10 tonnes/year.

standard conditions: a temperature of 273.15 K and a pressure of 101.3 kPa.

start-up and shut-down operations: operations whilst bringing an activity, an equipment item or a tank into or out of service or into or out of an idling state. Regularly oscillating activity phases are not to be considered as start-ups and shut-downs.

Substances: any chemical element and its compounds, as they occur in the natural state or as

produced by industry, whether in solid or liquid or gaseous form.

substantial change: for a small installation, means a change of the nominal capacity leading to an increase of emissions of volatile organic compounds of more than 25%. for other installations, means a change of the nominal capacity leading to an increase of emissions of volatile organic compounds of more than 10%. Any change that may have, in the opinion of the competent authority, significant negative effects on human health or the environment is also a substantial change,

volatile organic compound (VOC): any organic compound having at 293.15 K a vapour pressure of 0.01 kPa or more, or having a corresponding volatility under the particular conditions of use. For the purpose of this Directive, the fraction of creosote which exceeds this value of vapour pressure at 293.15 K shall be considered as a VOC.

waste gases: the final gaseous discharge containing volatile organic compounds or other pollutants, from a stack or abatement equipment into air. The volumetric flow rates shall be expressed in m³/hour at standard conditions.

APPENDIX 2: APPLICATION/RENEWAL DETAILS

Schedule 7

Application for a Certificate of Compliance/Renewal of a Certificate of Compliance by an operator of an installation using organic solvents

1. Name and address of the operator:
2. Address of the installation if different from 1 above:
3. (a) Have you previously been issued with a certificate of compliance for this installation-
- (b) If yes to 3(a), please state the date of expiry of the previous certificate of compliance:
4. State the activity or activities carried out or proposed to be carried out at the installation by reference to Schedules 1 and 2 of the Regulations:
5. Detail the type or types of organic solvent used or proposed to be used in the activity or activities:
6. State the estimated quantity of each type of organic solvent consumed or proposed to be consumed annually in each activity:
7. Will abatement equipment be used or is it used currently- If so, briefly describe:
8. Are you employing, or do you propose to employ, a solvent reduction scheme under Regulation 10(1)(b). If so, detail briefly any reduction targets to be achieved:
9. Enclosed:
 - Report from an approved assessor established by the Environmental Protection Agency under Regulation 7 of the European Union (Installations and Activities Using Organic Solvents) Regulations 2012 on the compliance of the installation; and
 - Application fee of € payable to the local authority.

Signature.....

Date.....

APPENDIX 3:

SUMMARY LIST OF INFORMATION TO BE GATHERED BY DRY CLEANERS

The following is a summary list of the information which must be gathered for a period of 12 months by dry cleaners. It is a summary only - **for more detail see the excel spreadsheet of sample records**. You use this information to compile the solvent management plan (see section 7) to see if you meet the requirements of the Regulations. The approved assessor will then review the solvent management plan and carry out spot checks on the back up documentation.

Information to be gathered by dry cleaners for a period of 12 months and kept on record prior to obtaining an Approved Assessor:

1. Weight of every load of product dry cleaned in the 12 month period.
2. Volume of perc added to the machine(s) in the 12 month period.
3. Purchases of perc in the 12 month period, including back-up invoices.
4. The weight of every load of perc containing waste sent off site in the 12 month period, and the appropriate waste transfer documentation from the waste contractor.
5. An analysis of a representative sample of waste for perc content (preferably in mg/kg). See Appendix 4 for accurate sampling methods. This does not have to be repeated annually, only when there is a change in equipment or a major change in operating practices.
6. An analysis of a representative sample of separator water for perc content. This does not have to be repeated annually, only when there is a change in equipment or a major change in operating practices.
7. An estimate of the volume of separator water generated in the 12 month period.
8. The stock levels on the opening day of the 12 month period of:
 - a. perc volume in machine tanks.
 - b. perc volume in machine carbon adsorber (if present).
 - c. perc volume in fresh containers, if any.
 - d. weight of perc containing waste on the premises.
9. The stock levels on the closing day of the 12 month period of:
 - a. perc volume in machine tanks.
 - b. perc volume in machine carbon adsorber (if present).
 - c. perc volume in fresh containers, if any.
 - d. weight of perc containing waste on the premises.
10. Information on the weight of any carbon from adsorbers disposed of in the 12 month period.
11. A written record of any training carried out.

A written record of any machine maintenance carried out.

APPENDIX 3a: Annual Report Template

You will need to update your solvents records on a weekly basis so that by year end, Section 9 of the records spread sheet will provide you with an actual emission figure (g solvent emitted/kg of clothes processed for the premises). The records spread sheet referred to is available on the Agency's website www.epa.ie.

This template should be used to complete your Annual Report using the relevant data from **section 9 of your solvents records spread sheet***. The completed should be submitted to the Local Authority before the 31st January each year.

Annual Report of Compliance

(In accordance with Article 13 of the European Union (Installations and Activities using Organic Solvents) Regulations 2012)

Company/owner/sole trader Name:

Address at which dry cleaning takes place:

Start Date of 12-month reporting period: _____

End Date of 12-month reporting period: _____

Date of first registration with your Local Authority: _____

Date of expiry of your current Certificate of Compliance: _____

Number of Dry Cleaning Machines in Use: _____

Machine Description (Manufacturer, Model Number, Age):

Machine Description (Manufacturer, Model Number, Age):

Type of Solvent in Use (e.g.Perc)_____

Annual Solvent Emissions (g solvent/kg clothes) for your Installation*:

Please return this report to your local authority before the 31st January each year. In addition to this report the local authority may require you to submit a solvent management plan or an approved assessor's report. The local authority will contact you if these additional reports are required.

Please ensure that you retain all records as your local authority may carry out spot checks to verify the accuracy of data submitted.

APPENDIX 4: ACCURATE WASTE SAMPLING

When taking a sample of your solvent waste for analysis, it is important that this sample is an accurate reflection of the drum contents. This is important for the dry cleaning industry as a typical waste drum will have perc at the bottom, water on top and dirt and fibres interspersed between the two layers.

Representative samples can be taken by what is known as a drum thief sampler, which consists of a narrow, hollow, rigid, tube, 6 – 16 mm in diameter, which is open at both ends, and of a length somewhat longer than the waste drum depth.

A typical procedure which might be used to get a representative sample using a thief sampler is as follows:

- slowly insert the thief sampler into the drum, allowing it to fill up with sample material, until the sampler touches the bottom of the drum.
- Seal the open end at the top of the tube, by covering with the thumb or using a rubber stopper, and remove the thief sampler.
- Carefully discharge the sample into an appropriate sample container (glass or plastic bottle of about a quarter litre volume with a tight cover – these are usually supplied by the company who will perform the analysis).

If your solvent waste contains a lot of solids and is sludgy in nature a more appropriate sampling device may be a valved drum sampler or a syringe sampler (available commercially).

APPENDIX 5: A TYPICAL MAINTENANCE CHECKLIST

This is a typical checklist only, and first reference should always be made to the machine manufacturer's manual. A maintenance record should be kept which records the dates any components are repaired or replaced.

DAILY

Wipe clean the:

- button trap door seal
- loading door seal
- lint filter door seal
- still door seal
- water separator door seal

Clean the button trap sieve.

WEEKLY

Check that the drum drains correctly and that there are no blockages.

Check the level control in the drum – is it operating? is it at the correct level?

Clean the still.

Clean the still thermostat.

Check the still thermostat – is it operating? is it at the required temperature?

Check the level control in the still – is it operating? is it at the correct level?

MONTHLY

If a carbon adsorber is in place, check the carbon is dry (if carbon is damp or wet – find source and repair)

If a carbon adsorber is in place, check for blockages or any channelling within the bed.

Check the dry cleaning machine is secured to the floor.

Clean the water separator, including a check of the vent for any blockages.

Check machine heating and condensing coils for lint build-up.

WHEN INDICATED

Change filter cartridges when the pressure reaches the max. specified.

If a condenser is in place, clean the condenser lint filter at the frequency specified by the manufacturer.

If a carbon adsorber is in place, replace the carbon once it is beyond regeneration (usually once a year).

EVERY SIX MONTHS

Carry out a detailed machine maintenance (see reference ETBPP 1997 for a list of six-monthly maintenance tasks).

Service the condenser cooling system (water or refrigerant).

APPENDIX 6: Approved Assessor's Report Template

EUROPEAN UNION (INSTALLATIONS AND ACTIVITIES USING ORGANIC SOLVENTS) REGULATIONS 2012

(S.I. No. 565 of 2012)

Approved Assessor's Report Template for Dry Cleaning

Name (legal entity) and address of the operator of the installation¹:

Address of the installation (if different to operator address):

Date of expiry of current certificate: _____

What is Annual Solvent Emissions (g solvent/kg clothes) for the Installation:

RELEVANT ACTIVITY – DRY CLEANING

Scheduled Activity:	Solvent Consumption Threshold (t/yr):
Dry Cleaning	No Threshold

COMPLIANCE OR OTHERWISE OF THIS INSTALLATION WITH THE REGULATIONS

In accordance with the European Union (Installations and Activities Using Organic Solvents) Regulations 2012 (S.I. 565 of 2012), the undersigned Approved Assessor hereby declares that the above named installation is²

in compliance with the requirements of the European Union (Installations and Activities Using Organic Solvents) Regulations 2012 (S.I. 565 of 2012)

not in compliance with the requirements of the European Union (Installations and Activities Using Organic Solvents) Regulations 2012 (S.I. 565 of 2012)

MAJOR NON-COMPLIANCES, MINOR NON-COMPLIANCES, AND OBSERVATIONS

The undersigned Approved Assessor notes the following in relation to this installation:

Issues outstanding from the previous inspection process	NONE <input type="checkbox"/>	YES <input type="checkbox"/> See section 4 of the report
Major Non-compliances (reason(s) for operation being non-compliant):	NONE <input type="checkbox"/>	YES <input type="checkbox"/> See section 4 of the report
Minor Non-compliances (less serious issues which in time could become major non-compliances – inspection passed):	NONE <input type="checkbox"/>	YES <input type="checkbox"/> See section 4 of the report
Observations (areas for improvement by the operator with a view to avoiding minor non-compliances in the future):	NONE <input type="checkbox"/>	YES <input type="checkbox"/> See section 4 of the report

INSTALLATION DETAILS

Competent authority³:

Type of installation:	new installation <input type="checkbox"/> (put into operation on or after 1 January 2013) NB must be registered & obtain Certificate of Compliance <u>before</u> operating)	existing installation <input type="checkbox"/> (in operation on or before 31 st December 2012)
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Directive's Mass Balance Terms relevant to dry cleaning		Relevance to Dry Cleaning	Value for the Installation (kg) ¹⁰
			12 month period: _ / _ / _ to _ / _ / _
Inputs of organic solvents (I):			
I1	The quantity of organic solvents or their quantity in preparations purchased which are used as input into the process in the time frame over which the mass balance is being calculated	Relevant. The amount of solvent put into the machine for the first time. The change of level of solvent in the machine between the start and end of the period is also added in. Use of spotting chemicals containing VOCs is also added.	
Outputs of organic solvents (O):			
O1	Emissions in waste gases	Relevant. The amount of solvent emitted from the machine that isn't captured by the condensers or adsorbers.	WILL BE CALCULATED BY SOLVENT MANAGEMENT PLAN AS PART OF THE TOTAL EMISSION FIGURE
O2	Organic solvents lost in water, if appropriate taking into account waste water treatment when calculating O5	May be relevant for any solvent released to water/sewer in separator water, but only if sanitary authority allows discharge. ¹¹	WILL BE CALCULATED BY SOLVENT MANAGEMENT PLAN AS PART OF THE TOTAL EMISSION FIGURE
O4	Uncaptured emissions of organic solvents to air.	Relevant to dry cleaning. Includes leaks, emissions from opening doors, solvent handling, etc.	WILL BE CALCULATED BY SOLVENT MANAGEMENT PLAN AS PART OF THE TOTAL EMISSION FIGURE
O5	Organic solvents and/or organic compounds lost due to chemical or physical reactions	Only adsorption is relevant. May not be relevant for every facility. Applicable to solvent removal from air or separator water. Doesnot include adsorbed solvent that is regenerated and reused within the dry cleaning machine.	
O6	Organic solvents contained in collected waste	Relevant – waste solvent itself plus solvent in carbon filters disposed. Also separator water if it is handled as hazardous waste.	
O8	Organic solvents contained in preparations recovered for reuse but not as input into the process	Any waste sent away for recovery/recycling rather than disposal. May not be relevant to every dry cleaning facility.	

Product Processed	
Product processed (kg)	Value for the Installation for the 12 month period

2.1 Solvent Management Plan Calculations

Taking the values for I1, O5, O6, and O8 as relevant from the table in section 2.1 and inserting them into the following mass balance equation:

$$\begin{aligned} \text{Actual total emissions: } & (O1 + O2 + O4) = I1 - (O5 + O6 + O8) \\ = & (\quad) - [(\quad) + (\quad) + (\quad)] \\ \text{Actual total emissions} & = \quad \text{kg} \\ \text{(multiplying by 1000):} & = \quad \text{g} \end{aligned}$$

3 DEMONSTRATION OF COMPLIANCE

Total emission value = Actual total emissions in g / Product processed in kg

$$\begin{aligned} = & (\quad \text{g}) / (\quad \text{kg}) \\ = & \quad \text{g/kg} \end{aligned}$$

As can be seen from the above, the installation:

- is in compliance
- is not in compliance

with the total emission limit value of 20 g solvent emitted per kg of product cleaned and dried.

4 ISSUES OUTSTANDING FROM THE PREVIOUS INSPECTON PROCESS AND MAJOR AND MINOR NON-COMPLIANCES, & OBSERVATIONS¹²

4.1 Issues outstanding from the previous inspection process

A review of any issues outstanding from the previous inspection as noted in the compliance report or recommendations included within the certificate of compliance that was issues by the relevant Local Authority.

4.2 Major Non-compliances

Major non-compliances: issues in relation to the Solvents Regulations which result in a failed inspection and must be rectified to ensure compliance is restored within the shortest time possible (if there is immediate danger to human health the operator must suspend operation until the competent authority allows restart of operations concerned).

Major non-compliance(s) in relation to the installation are as follows:

4.3 Minor Non-compliances

Minor non-compliances: issues in relation to the solvents Regulations which do not result in a failed inspection but which should be addressed by the operator within the time period as recommended by the Approved Assessor perhaps to avoid major non-compliances arising in future.

Minor non-compliance(s) in relation to the installation are as follows:

4.4 Observations

Observations(s): issues in relation to the Solvents Regulations which do not result in a failed inspection but which should be addressed within the time period as recommended by the Approved Assessor perhaps to avoid minor non-compliances arising in future.

Observations(s) in relation to the installation are as follows:

5 RECOMMENDED DURATION TO BE ATTACHED TO THE CERTIFICATE OF COMPLIANCE

5.1 Recommended duration:.....

ENDNOTES TO THE REPORT FOR DRY CLEANING

¹ This should be a legal entity, i.e. either sole trader, or body corporate, and not simply a trading name or trading company. The operator address can be different to the address where the installation is located or is to be located.

² Tick that which is applicable based on the evidence of the site visit and section 3 of the Approved Assessor's report.

³ Indicate who is the competent authority. In the case of activities which are IPPC licensable, the competent authority is the EPA. For all other scheduled solvent activities, the competent authority is the county council or city council in whose functional area the installation is located.

⁴ Tick whether the report is being submitted to fulfill the annual reporting requirement, or because a substantial change is planned for the installation, or because the installation is a new installation which has not yet commenced operation.

For dry cleaning, a substantial change is where:

- There is a change in the nominal capacity (i.e. additional machines or a new larger machine) leading to an increase of more than 25% in **emissions** of VOCs, or where

- The local authority decides a change is a substantial change if it ~~considers~~ it may have significant negative effects on human health or the environment.

Note that a replacement machine, or even an additional machine, may **not result** in a 25% emissions increase, since new machines emit less than older models.

⁵ This is the register number assigned to the installation by the competent authority. If this is the first Approved Assessor's report to be submitted for the installation, a register number will not yet have been assigned. In this case insert "to be assigned" in this section. If an installation has previously submitted an Approved Assessor's report to the competent authority, a register number will have been assigned to the installation on the certificate of compliance. In this case insert this register number, if known.

⁶ Insert value for I1 from the solvent management plan in section 2.

⁷ The name of the person - the Approved Assessor's inspector - who carried out the site visit and compiled the report. Remote electronic submittal will require the approval of the competent authority e.g. subject to electronic signature.

⁸ The name of the Approved Assessor organisation or company.

⁹ Insert here the values for I1, and as relevant O5, O6, and O8 that have been calculated for the installation.

¹⁰ A waste containing perchloroethylene would be hazardous by carcinogenic (H7) at $\geq 1\%$ and by ecotoxic (H14) at $\geq 2.5\%$. (Source: Environment Agency (UK) Hazardous Waste Interpretation of the definition and classification of hazardous waste (2nd edition v2.1)).

¹¹ Look at previous Approved Assessor's Reports to see if previous minor non-compliances or observations have been addressed.

APPENDIX 7: FURTHER READING AND REFERENCES

- CINET 2001 *Frequently Asked Questions on the Solvent Emissions Directive in Relation to the Dry Cleaning Industry*, International Committee of Textile Care (CINET), May 2001.
- Corinair 1999 *Joint EMEP/CORINAIR Atmospheric Emission Inventory Guidebook*, Second Edition, Chapter 7.4.2.2 Dry Cleaning, Copenhagen: European Environment Agency, 1999.
- DENR 2000 *Dry Cleaners 2001 Air Quality Compliance Calendar*, North Carolina Small Business Assistance Program, DENR Customer Service Centre, 2000.
- Entec 1999 *Regulatory and Environmental Impact Assessment for the Implementation of the EC Solvent Emissions Directive*, Department of the Environment, Transport and the Regions, Entec UK Limited, 1999.
- EPA 1997 *Integrated Pollution Control Licensing BATNEEC Guidance Note for the Manufacture or Use of Coating Materials*, Irish Environmental Protection Agency, 1997
<http://www.envirowise.gov.uk/envirowisev3.nsf/Key/DBRY4PHFFQ?OpenDocument>
- ETBPP 1996 *Perc Consumption in the Dry-cleaning Industry*, Environmental Technology Best Practice Programme (ETBPP), UK, 1996.
- ETBPP 1997 *Good Practice Guide: Solvent Consumption in Dry Cleaning*, Environmental Technology Best Practice Programme (ETBPP), UK, 1997.
- Indiana 2001 *Compliance Manual for Indiana's Perc Drycleaners*, Indiana Department of Environmental Management Compliance and Technical Assistance Program, 2001.
- LA County 1996 *Pollution Prevention Opportunities for the Dry Cleaning Industry*, County Sanitation Districts Of Los Angeles County, 1996.
- Mahrwald 2001 Mahrwald, B., *Regulatory Measures and Possible Activities for Reducing VOC in the Surface Treatment in Germany - Implementation of EU Solvent Emission Directive*, Federal Environment Agency, Germany, 2001
- New York 1997 *PART 232 Perc Dry Cleaning Facilities*, Division of Air Resources, New York.
- Ohio 1996 *Environmental Guide for Ohio Dry Cleaners*, Ohio EPA, US, 1996.
- Queensland 1999 *National Pollutant Inventory Emission Estimation Technique Manual for Drycleaning*, Queensland Department of Environment, Australia.
- SCAQMD 1997 *Rule 1421 Control of Perc Emissions from Dry Cleaning Systems*, South Coast Air Quality Management District (SCAQMD), California, 1997
- USEPA 1994 *General Recommended Operating and Maintenance Practices for Dry cleaning Equipment (Only for use when Manufacturers' Information is Unavailable)* (EPA-4531R-94-07)
<http://www.epa.gov/ttn/atw/dryperc/perc2.pdf>
- USEPA 1995 *Profile of the Dry Cleaning Industry* EPA Office of Compliance Sector Notebook Project, USEPA, 1995.
- USEPA 1996 *Plain English Guide for the Dry Cleaners, Step By Step Approach to Understanding Federal Environmental Regulations*, USEPA.
- USEPA 1998 *Cleaner Technologies Substitutes Assessment: Professional Fabricare Processes*, USEPA 1998.