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DCERP Best Management Practices

WHAT ARE THEY AND WHY ARE THEY IMPORTANT?

We all know drycleaning operations use chemical solvents, generate liquid and solid wastes, and have air emissions as part of their daily activities. Best Management Practices (or BMPs) are practical guidelines to help ensure that you and your employees handle these solvents and wastes in a manner that is safe for human health and the environment. The Tennessee Drycleaner Environmental Response Program (DCERP) has BMPs that specifically address Waste Management, Material Storage, Release Management, Employee Certification Training, Secondary Containment, Flooring Integrity, and Solvent Delivery. Air emissions BMPs also address solvent leaks to the atmosphere. Not following all BMPs could mean you lose your certificate to operate a drycleaner! Inside, you will find more details on DCERP's BMPs as well as other helpful information.

DCERP BEST MANAGEMENT PRACTICES INCLUDE:

- Waste Management
- Materials Storage
- Floor Sealants and Secondary Containment
- Solvent Delivery and Transfer
- Employee Training
- Spill Control and Release Management
- Leak Detection Inspection



INSIDE

- Best Management Practices: What are they and why are they important?
- Solvent Solutions
- What To Expect When You Are Inspected by DCERP
- Other DCERP Requirements
- Plan Ahead for your Annual Registration

IMPORTANT DATES

Annual Registration Fee and Annual Registration Form due:

- October 31st**

Quarterly Solvent Logs Due:

- January 31st**
- April 30th**
- July 31st**
- October 31st**

More Information Inside for All Tennessee Drycleaners

WASTE MANAGEMENT

WASTE INCLUDES:

- Used or spent solvent
- Separator water
- Still bottoms
- Muck
- Filters
- Sludge

SOLVENTS OR WASTE CAN NEVER BE:

- Put in a dumpster or trash can;
- Or poured down a drain, a toilet or sink;
- NEVER on the ground or unsealed floor

Any dense solvents, such as Perc or DrySolv and their associated wastes, including separator water, still bottoms, muck, and filters, must be disposed of as hazardous waste by a licensed waste hauler. These dense solvents are more toxic to humans and the environment than other cleaning solvent choices. All of these wastes or wastewater must be disposed of by a permitted waste transporter. Documentation of waste disposal must be maintained on-site for a minimum of five years.

Light solvent wastes (like DF-2000, EcoSolv, Solvon K-4, etc.) may be disposed of as a hazardous waste, or can alternatively be disposed of as a Special Waste, which is generally a cheaper disposal option. To dispose of light waste as a Special Waste, you first must apply for a Special Waste Permit from the Division of Solid Waste. *Light solvent waste may never be disposed of in a dumpster or trashcan!*

All waste types must be considered for disposal and put into properly labeled drums or containers. Your waste disposal company should provide the appropriate drums and labels. You must keep all waste records for at least five years at your facility and available for inspection.

Separator water will contain waste solvent and must be managed as waste. This means that you are prohibited from pouring separator water down drains, sinks, or toilets. The only acceptable methods of disposing separator water is to either put it in a container for disposal or to treat the water using carbon filters to capture the waste and then mist the treated water to the outside of the facility with a mister. If you collect separator water for disposal, the container must be kept closed unless wastewater is being added. If you operate a wastewater treatment unit, you must regularly check that the unit is operating properly and ensure that the evaporation nozzles do not become clogged. The filters on the evaporation unit must be properly maintained, must be drained in a sealed container for 24 hours before replacing, and be put in the proper waste drums before being disposed of as waste.

MATERIAL STORAGE, FLOOR SEALS & PANS, MACHINE RELEASES, SOLVENT DELIVERY AND TRANSFER

- Dense solvents, like Perc, must be delivered to the machine via a closed loop/direct coupled mechanism to minimize the potential for a release. Closed loop transfer moves the solvent to the machine from the delivery container without risk of either emissions or spills using specially designed hoses and couplers. You **CANNOT** add dense solvent to the machine by pouring solvent into the machine.
- For a petroleum machine, you **CANNOT** pour the solvent from the product container directly into the machine. You must pump the petroleum solvent to your machine from the container into the machine.
- Secondary containment is required for all chemical storage, waste container storage, condensers, evaporators, and the dry cleaning machine. The secondary containment for chemical and waste storage and for your machine must be capable of containing up to a quantity equal to 110% of the largest tank in the machine.
- Rules for all storage containers:
 - Must be an approved container type
 - Clearly labeled
 - Must have lids
 - Lids on all solvent and waste containers must be closed, except when adding or removing materials
 - Must be labeled with the waste type and the date you first added waste
- Cartridge filters must be drained for at least 24 hours in a closed container and then put in a sealed *and* labeled container for proper disposal.
- The floor surface around the machine and in chemical storage areas must be sealed with a solvent resistant coating that is compatible with dry cleaning solvents. This sealant should extend around all sides of the machine and should extend several feet around the machine perimeter and storage areas. Under our BMPs, it is not OK to have cracked flooring or floor joints that might cause a release pathway. All cracks and floor joints must be properly sealed with solvent resistant materials.
- Material Safety Data Sheets (MSDS) must be available for all products used on site including spotting fluids. The MSDS will give you and your staff important first aid and safety information in the event of an emergency.

EMPLOYEE TRAINING (CERTIFICATION)

At least one Certified Environmental Drycleaner (CED) OR one person trained through the Environmental Compliance Training (ECT) program must be on your staff at each dry cleaning facility.

- CED is offered through the Drycleaning and Laundry Institute.
- ECT is free training from DCERP – Our summer class schedule will be mailed out soon, so sign up quickly, because classes fill up fast! This is also another opportunity for you to ask the DCERP staff any and all of your questions about our program and the BMPs

SPILL CONTROL AND RELEASE MANAGEMENT

We hope you do not have an uncontrolled spill, but if a spill occurs, you must have a written plan for what you need to do. Minimum requirements include:

- Spill control materials, such as absorbent mat pads and a spill response kit, on hand in your facility and accessible for your employees
- Employee training on the safe, proper way to respond to any spill or emergency
- Little or no water should be used during your cleanup
- Rags can be used on small spills and then placed back into the machine
- Dry absorbent materials may be used for larger spills
- Don't let the emergency get worse - keep spills from entering gutters and floor drains, preventing the spill from escaping your control
- Floor drains located near your machine and chemical storage areas MUST be blocked and sealed

If you have questions about BMPs or any other aspect of DCERP, call the program!

It is better to know the right ANSWERS from the people who know than to find out later that you have committed a violation.

MACHINE AND LEAK DETECTION INSPECTIONS

All drycleaners should check once a week for leaks. If you have an air permit, you will have specific requirements that your machine will have to meet in order to stay in compliance with your air permit. You may have more than one air permit if you have more than one machine. You should contact your local air permit authority if you have questions about your air permit.

- DO inspect your equipment once a week for vapor leaks per the requirement of your air permit
- DO conduct recommended machine maintenance and repair or replace leaking seals and fittings
- If your equipment does leak, control the leak by collecting the dripping fluid in a container or drip pan and by making the required repair as soon as possible
- DO inspect the refrigerated condenser temperature or pressure once a week to make sure it meets the standard specified by your air permit

WHAT TO EXPECT WHEN DCERP STAFF INSPECT YOUR FACILITY

The ultimate goal of any inspection is to ensure that your facility is in compliance with program regulations, which therefore reduces the impact of dry cleaning chemicals on your workplace and the environment. When we visit you, we will want to see any dry cleaning machines that you operate, your solvent storage areas and your waste disposal records. We also will review your facility registration certificate and verify that your staff has received certification training, either from DCERP or an outside source. We will evaluate your operational procedures to ensure that BMPs are implemented properly. While we are there, you also have an opportunity to ask any questions that you might have about the program, new technologies and new solvents.

Remember, when you sign and submit your annual registration form, you are certifying that your facility is following all of the DCERP BMPs. If your operation is found not to be using the BMPs, it is considered non-compliance with DCERP rules and may serve as the basis for denial of an application into the response program and possibly penalties. If there is a release and the property becomes contaminated with dry cleaning solvent, you would be responsible for all of the costs to clean up your facility and may also have your certificate of registration revoked.

SOLVENT TYPES AND HOW THEY ARE CLASSIFIED BY DCERP

Several cleaning options are available to you as a drycleaner, including employing standard wet cleaning or dry cleaning using a solvent in place of water. Any dry cleaning solvent other than water requires registration through DCERP. Handling of each solvent type and the wastes generated by the cleaning process are different. In Tennessee, solvents are classified as being either light or dense, as determined by the solvent's specific gravity, which is listed on the Material Safety Data Sheet (MSDS) provided by your supplier. **Solvents with a specific gravity greater than 1 are dense and less than 1 are light.** Call DCERP if you are unsure about a particular solvent.

Solvent Name	Light or Dense?	Associated Hazards
Perchloroethylene (Perc or PCE)	Dense	Hard to clean up spills or releases; moves easily through soil and damages the environment; can cause cancer and is toxic to humans; ALL waste (filters, lint, muck, separator water and used solvent) must be disposed of as hazardous waste. Some states have banned Perc and some landlords will not allow its use because of the many hazards
Dry Solv (nPB, n-propyl bromide)	Dense	Hard to clean up spills or releases; moves easily through soil and damages the environment; corrosive to machinery, unless the machinery was designed for Dry Solv; manufacturers can void warranties on machines not built for Dry Solv; this solvent is linked to nervous system damage and reproductive damage in humans; ALL waste must be disposed as hazardous waste
Stoddard Solvent, EcoSolve, DF-2000, Solvon K4, Mineral Spirits, Kwik Solve, Rynex, Green Earth, Etc	Light	Flammable or combustible; require explosion-proof equipment; some landlords do not allow on property, due to fire codes and fire hazards; waste can be disposed as either hazardous waste or special waste but only with a permit; waste CANNOT be put into trashcans or dumpsters

SOME FRIENDLY REMINDERS...

SOLVENT SURCHARGES

By law, your solvent supplier must collect the solvent surcharge fee any time you purchase solvent. Fees are as follows:

- Dense solvents are \$15 for every gallon purchased.
- Light solvents are \$1.50 for every gallon purchased.

If you haven't submitted the surcharge or reported it to DCERP, you can be charged with penalties and lose your ability to operate a dry cleaning facility in Tennessee.

SOLVENT LOGS

All active drycleaners are required to turn in quarterly solvent logs, no matter what kind of solvent you use. If you didn't buy solvent in a particular quarter, you still must submit the solvent log with a zero in the quantity. Please fill out the form completely, including the facility name, address and phone number. If you have any questions or need a form, please call the DCERP Administrator at 615-741-2281 or visit our website at:

<https://www.tn.gov/environment/program-areas/rem-remediation/rem-drycleaning.html>

PLAN AHEAD FOR ANNUAL REGISTRATION

While the exact amount of next year's registration fee will not be known until August, it is a good idea to plan ahead so that you have the fee when it is due. We recommend you save up for the maximum registration fee amount of \$2,500 until you receive your annual invoice. Remember, when you don't pay your fee by October 31st, penalties accrue on your balance and you cannot buy solvent for your business until ALL fees and penalties are paid. Planning ahead will save you time and money!