



Toxics & Hazards

Toxics Use Reduction Act (TURA)

TUR Reporting and Planning for Dry Cleaners



Presentation Agenda

- How dry cleaning industry is regulated
- Elements of the Environmental Results Program
- TURA reporting
- TURA planning



The Environmental Results Program (ERP)

- Submit annual Certification Form to DEP
 - Keep records regarding perc purchase receipts, weekly equipment monitoring, weekly leak checks, repair logs, and yearly perc consumption records for 3 years
-

EPR Covers:

- **Industrial wastewater discharge** (separator water, vacuum water, washing machine water, compressor and boiler blowdown water).
 - **Hazardous waste** (waste perchloroethylene, muck, filters for perchloroethylene, saturated rags/wipes/lint, etc).
 - **Air emission** (perchloroethylene, dry cleaning machines, boilers, spotting solvents or other contaminants to open air).
-

ERP (cont.)

Dry cleaners have to:

- Apply for hazardous waste generator status
- Check for leaks
- Replace faulty/worm gaskets
- Use refrigerated condenser or carbon adsorber properly
- Comply with storage requirements (container inspection, labeling)
- Prepare for emergencies (alarm system, fire extinguishers, workers training, etc.)

Perc Designation

Perc was designated a Higher Hazard Substance (HHS) in 2008.

Reporting threshold: 1,000 pounds

First reports due: **July 1, 2010**

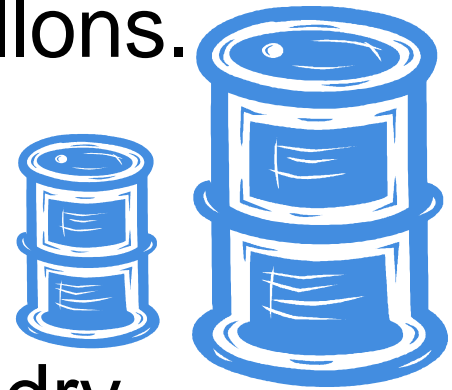
Planning summary due: **July 1, 2012**



Toxics & Hazards

Toxics Use Reduction Act (TURA)

- One gallon of perc = 13.5 pounds, 1,000 pounds is about equal to 75 gallons.



- Perc is **OTHERWISE USED** in dry cleaning.



Which Companies Have to Comply?



1. Employs the equivalent of at least **10 full-time employees** (FTEs) (in 2009);
2. Conducts business activities in a **listed SIC or NAICs** code – drycleaning is listed; AND
3. Manufactures, processes or otherwise uses a TURA-regulated chemical in **excess of a reporting threshold** (in 2009).



Employee Examples

- Employees (including drivers, bookkeepers, sales staff) serving the facility that uses perc in quantities above threshold (20,000 hours are worked by all employees).
 - If they serve two facilities, count the time they spend serving the facility that must report under TURA.
 - Don't count time spent serving the drop-off facility.
-

Counting up Usage

- Count perc each time it goes into the Production Unit
 - Jan. 1 inventory plus amounts purchased during the year minus Dec. 31 inventory
 - Use best engineering estimate
 - If purchases are loaded directly into the machine at time of delivery, this is essentially the same as tracking purchases
-

The Production Unit

If the perc is only used completely within one machine, that machine (or the entire facility) is the production unit.

If the perc is used within two machines, there is a choice: call them one production unit, or identify two production units.

If perc is used for spotting outside of the machine, you can: designate it as a third production unit, or incorporate within another production unit. *All places where the chemical is used must be within a production unit.*

Unit of Product

Pick a Unit of Product that enables measurement of work performed. It should be a reliable indicator of changes in production levels - increase or decrease as production goes up or down.

Such as: pounds of clothing washed, batch cleaning cycles performed, number of pieces by type (shirts, pants, sweaters, etc.). Gallons of perc can not be used as a Unit of Product.

Non-physical measures may be used, such as hours of operation, labor hours, and dollar sales. But these can vary for reasons unrelated to production. If non-physical Unit of Product is chosen, a written explanation as to why a physical measure cannot be used must be provided.

Byproduct

Byproduct is all the perc that leaves a Production Unit

These are **not** byproduct:

Substances that are recycled through a process that is "integral" to the production unit are not byproducts . They never leave the production process.

Mass Balance

c. Manufactured

2000

e. Otherwise used

g. Shipped In Or As Product

d. Processed

2000

f. Generated As Byproduct

State-Only Form R/A

- TURA (state) regulates more chemicals than EPCRA (federal) and a broader range of facilities (i.e., NAICS codes).
 - Since perc is one of these chemicals, a federal Form R is not required, but facilities must submit a State-Only Form R/A in their toxics use report
-

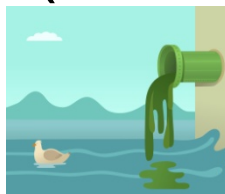
State-Only Form R/A

Dry cleaners have to determine:

- Maximum amount of the toxic chemical on site at any time during the calendar year
 - Quantity of the toxic chemical entering each environmental medium
-

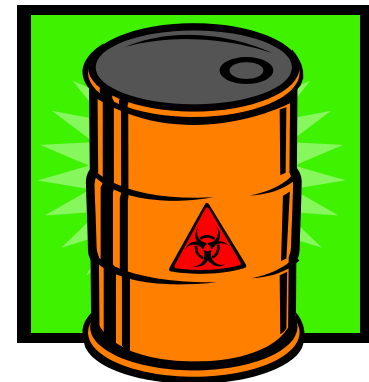
State-Only Form R/A: Releases

- The pounds estimated to be released
- Fugitive or non-point air emissions
- Stack or point air emissions
- Discharges to receiving streams or water bodies (should be none)



State-only Form R/A: Transfers

- How much was discharged to a POTW (sewage treatment facility)
- How much was shipped to a waste treatment facility (RCRA)



State-Only Form R/A: Also...



- Recycling methods (on-site and off-site)
 - Quantity released to the environment as a result of remedial actions, catastrophic events, or one-time events not associated with production processes (pounds/year)
 - Production ratio or activity index
 - Not reported in the first year, but records must be kept for calculations in following years.
 - Source reduction activities you are engaged in
-

Differences Between TURA and ERP Reporting

Element	TURA	ERP
Thresholds	10 FTEs, 1,000 pounds of perc use	None; all perc users covered
Reporting Period	Calendar year	Last 12 months from date of compliance certification (due each September)
Quantities Reported	Mass Balance - pounds of perc used, byproduct, shipped in product, released, transferred off-site as waste (count perc portion of waste only)	Gallons of perc purchased and pounds of hazardous waste (includes more than just perc portion of waste)
What do you Look at to Determine Quantity?	Production unit(s), including perc used outside machines (e.g., spotting)	Perc machine(s)
Other Information	Description of why perc used, unit of product, process code, etc.	Compliance Information

TUR Planning for Dry Cleaners

- **Changes to consider:**
 - improve O&M
 - worker training
 - equipment modernization
 - company has to make a good faith effort to consider alternatives to material inputs and processes
-

TUR Planning for Dry Cleaning

- A Dry Cleaning Template will be available prior to the plan due date.
- Goals – to streamline planning process
 - make it affordable and simple for dry cleaners

