

The Environmental Corner

By: Steve Henshaw



Good Housekeeping Includes Good Record Keeping

You can tell a lot about a dry-cleaner's operation by the way that he conducts housekeeping. That is to say that if a drycleaner keeps a clean store, he probably handles chemicals in a manner that minimizes environmental releases. However, good housekeeping alone may not keep you out of hot water with the regulatory agencies.

There are some simple, effective and inexpensive ways to protect your business and your assets from liability by keeping good records. If you've ever watched one of the procedural crime dramas, the plot usually turns around "the evidence." Creating, organizing and maintaining records can be the evidence that keeps you out of trouble. Hazardous waste manifests, perc purchase/disposal records, transporter license numbers and treatment facility identification numbers are all examples of things you should (or, in some cases, *must*) keep records of. However, those records aren't just in case of a major problem. They can help

you identify a minor problem *before* it gets serious.

There are two major regulatory areas that concern dry cleaners: health and safety and environmental. Both areas require different kinds of record keeping and reporting and unfortunately, there's not very much overlap. On the upside, though, record-keeping requirements for health and safety are fairly straight-forward. Although federal standards represent the baseline, your own state and local

standards may be different or more stringent – your local health department can tell you if meeting federal standards is sufficient.

The main health and safety record-keeping topics are Hazard Communication (HAZCOM) and Safety Training. Good record keeping is *required* when it comes to HAZCOM and, if done well, can reduce the risk of spills and employee exposure. The

Continued on page 2

As Seen In...



December 2009

biggest component of HAZCOM is keeping an active, comprehensive and updated Material Safety Data Sheet file. Material Safety Data sheets are manufacturer-provided documents designed to provide workers and emergency personnel with proper procedures for handling or working with a particular substance and include information like the physical makeup, odor, flashpoint, toxicity and first aid procedures. Federal law requires that you have an MSDS for every substance you use in the operation of your business, that those MSDSs be retained for 30 years and that the MSDS file must be updated on an annual basis.

In order to set up an MSDS file, you will need an index of all of the substances you have on site, which brings up an important point: containers have to be properly labeled. A proper label includes the identity of the substance and general information regarding the substance contained. The index you develop is your checklist for your MSDS file and your annual update. When you conduct your update, remember to:

- Add new substances to the list and make sure you have MSDS's for them;
- Subtract eliminated substances from the index but *do not* throw the MSDS's away. Move them to an "inactive" section of the file; and
- Check to make sure that none of the MSDS's have been updated by the manufacturer since last year.

Annual HAZCOM training is required by law while general safety training is only required immediately upon hiring. Most dry cleaners can break their employee safety training into two sectors – front desk/other employees not exposed to chemicals and employees who work around/with dry cleaning chemicals. Record keeping as it applies to training is fairly simple:

- Develop an Emergency Action Plan (if you have less than 10 employees, this can be verbal, although this is not recommended);
- Conduct the applicable training;
- Provide employees with a sign-off form indicating that they received and understood the training; and
- *Retain the records.*

Many states have generic training program outlines available through either their worker safety or environmental protection department. There are also consulting companies that can help you develop your MSDS file to ensure that it is updated on an annual basis, create a HAZCOM program, draft an Emergency Action Plan, and assist with safety training.

If your HAZCOM and Safety Training programs are carried out well, your employees are not only less likely to get injured and trigger a visit from your friendly workplace safety inspector and a worker's compensation claim, they're *also* less likely to mishandle or misuse the substances and equipment in ways that could result in a release to the

environment.

If you're meticulous in keeping track of how much perc you use, reclaim and dispose of, it's much easier to notice a sudden change in your consumption, find the leak and keep the release incidental instead of serious.

As a dry cleaner owner/operator, chances are that in addition to having expertise in cleaning clothes, you're also an electrician, a mechanic and a plumber when the need arises. You know that electricity follows the path of least resistance (especially if that path is short), that when machinery stops working, it's always a \$0.05 plastic part (that's conveniently inaccessible) and that when a pipe leaks, water runs downhill (towards your paper records storage). Perc follows Murphy's law, too. Just like your electrical, mechanical and plumbing systems, though, an ounce of prevention is worth a pound of cure. Here are a few simple things you can do to keep Murphy at bay (and perc where it belongs):

- Make an inspection schedule for your dry cleaning machine, waste containers, separators and stills...and stick to it. Have a log set up for those inspections and a schedule to review it – you might notice something you missed in time to head off a problem.
- Know where the utilities enter and exit your facility – perc often finds its way into the environment by following these pathways. Knowing where the utility

Continued on page 3

corridors are and taking care to isolate them from potential spills is a simple and effective way to avoid a release.

- If you do not already have them, consider installing spill trays under your drycleaning machine and any containers or areas where perc or perc-saturated materials (like wet lint) are stored. Although the newer, closed-circuit machinery is much less prone to spills and leaks, an obsessive tendency to keep perc sources on spill trays could prevent the headache of calling the emergency spill hotline.
- Ensure that you have spill socks/tubes on site to prevent any perc spills from getting near sump-pumps, floor drains or other escape routes. Keep in mind that if a spill occurs and you utilize a blanket or comforter to soak up the spill, that perc can be reclaimed in your machine.
- Seal any cracks in your facility's

floor and investigate painting your floor with a solvent-resistant paint/sealer. Even a slow, unnoticed leak near a hairline crack in the floor can lead to contaminated soil and groundwater.

- If your facility has any indoor storm drains, filling them with a low-permeability (high cement content) concrete prevents perc from having an express-lane to groundwater.
- Make sure you use appropriate containers for your separator water – a hose feeding an open five-gallon bucket is *never* a good idea. Check that the hose fits snugly into the securely covered container (but you should already know that does since you regularly inspect and note it in the inspection log according to your schedule). Keep the bucket in a spill collection container.
- Ensure that your waste storage area is secure and, if practical, bermed. Never store your perc-related

waste next to your dumpster. Your perc-related waste could accidentally get picked up with your non-hazardous solid waste, the container could be damaged by the dumpster pick-up and for whatever reason, children are often fond of playing around dumpsters.

- If you use a mister, make sure you change the cartridges often. Typically the user manuals are general in nature regarding the change out frequency, but they don't account for lint and surfactants clogging the filters and allowing perc to bypass the carbon filtration system.

Although it may be a short list with fairly simple and inexpensive solutions, adopting these practices can help protect your business *and* the environment. It can also go a long way toward protecting you from future liability and never having to call me and that's probably a good thing.