

PRESSING CONCERNS

*A Complete Guidebook To Environmental
Compliance For Colorado Dry Cleaners*

**COLORADO DEPARTMENT
OF PUBLIC HEALTH
& ENVIRONMENT**

DEVELOPED WITH THE SUPPORT OF THE:
U.S. Environmental Protection Agency, Region 8
U.S. Small Business Administration
Rocky Mountain Fabricare Association

4435
AAA DRY CLEANERS

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Rocky Mountain Fabricare Association

11166 Huron Street, #27, Denver, Colorado 80234, (303) 433 - 4446

Gary E. Leeper, Executive Director / Email: gary.imi@qadas.com

Dear Fellow Dry Cleaners:

Over the past year, a special task force has been working on behalf of the Dry Cleaning industry in the state of Colorado. This task force consisted of representatives from the Colorado Department of Public Health and Environment, the U.S. Environmental Protection Agency, the Small Business Administration's Ombudsman's office, and several RMFA members representing the Colorado dry cleaning industry. The purpose of this task force was to develop a comprehensive environmental compliance guide that was written in plain English in a format as compact as possible. I believe the task force has accomplished their objectives.

The fact that this project was started shows that there has been a definite change of direction in the way our regulatory agencies are approaching compliance. There has been an obvious shift in focus from enforcement to education. This means our industry now has a number of allies to help us understand and comply with the overwhelming number of requirements we face. They have always been there, but now we know that they are there to help all members of our industry.

However, ultimately you are responsible for compliance. I urge you to use this guide in your Dry-cleaning operation. Please keep this booklet in your production plant where you and your staff can refer to it as necessary. Don't bury it in the corner with the rest of the things you plan to read some day. The task force has provided a valuable tool with the information you need to operate in compliance, but the rest is up to you.

Sincerely,

Brad L. Ewing

**Brad L. Ewing, President
Rocky Mountain Fabricare Association**



Affiliated with the International Fabricare Institute

BACKGROUND

On October 21, 1998, representatives from the Small Business Administration's National Ombudsman's staff and the Rocky Mountain Regional Regulatory Fairness Board members met with Environmental Protection Agency (EPA) Region 8 officials, including Regional Administrator Bill Yellowtail. Initiated by Region 8 Regulatory Fairness Board member, Albert Gonzales, the purpose of the meeting was to identify everyday Small Business Regulatory Enforcement Fairness Act (SBREFA) issues and to examine whether a joint endeavor would make sense.

Over the next months, discussions were held between the Ombudsman's office and the EPA Region 8 about how to proceed. In early February, it was decided to try to build upon the success of the National Association of Homebuilders and the Occupational Safety and Health Association (OSHA). That effort had produced a guidebook summarizing OSHA's regulations in order to increase compliance without fines or penalties. Region 8 EPA and the National Ombudsman agreed to create a similar project for the dry cleaning industry because that industry is highly regulated and relatively active on regional and national levels. The project expected to explore ways to develop a similar guidebook that would address the regulatory concerns of dry cleaners and what they need to do to comply with environmental regulations.

The Dry Cleaner Workgroup Committee came together on April 29, 1999. The group began by focusing on the existing compliance models available to the industry. The group expanded to include members from the Colorado Department of Public Health and Environment, who offered their invaluable assistance. The workgroup found that there was an abundance of regulatory guides available from the various entities charged with compliance of dry cleaners. However, dry cleaners were still not clear on 1) what regulations affected them and 2) what they should do to comply with those regulations.

The workgroup recommended a guide that was easier to understand (written in plain language) and one that sought to address all environmental requirements in one place (multi-media including air, water, and waste regulations).

What follows is "Pressing Concerns, A Complete Guidebook to Environmental Compliance for Colorado Dry Cleaners. It is hoped this guide helps dry cleaners achieve compliance with the regulations a dry cleaner faces in Colorado in an easier manner.

The workgroup members are:

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- Brad Ewing, Rocky Mountain Fabricare Association, Greeley, CO
- Cathy Heald, Colorado Department of Public Health and Environment, Office of Customer Service, Small Business Ombudsman
- Scott Klarich, Colorado Department of Public Health and Environment, Office of Customer Service, Environmental Customer Assistance Center Manager
- Nick Melliadis, Colorado Department of Public Health and Environment, Air Pollution Control Division, Small Business Assistance Program
- Jim Nixon, Nu-Way Cleaners, Greeley, CO
- Gary Peele, U.S. Small Business Administration, Office of the National Ombudsman, Regulatory Fairness Program
- Christine Phillips, U.S. Environmental Protection Agency, Region VIII Office
- Richard Right, Katzson Brothers, Inc., Denver, CO
- Steven Toltz, Dependable Cleaners, Denver, CO
- Warren Toltz, Dependable Cleaners, Denver, CO
- Maurice Velasquez, U.S. Environmental Protection Agency, Region VIII Office

Please note that this guide provides information on certain environmental requirements that may affect a dry cleaner and is not intended to offer legal advice. This guide is intended as advisory guidance only and is not intended as a substitute for reading the laws or regulations. In addition, laws and regulations change over time, hence the need on the part of the reader to always get current advice and information.

Pressing Concerns - A Complete Guidebook to Environmental Compliance for Colorado Dry Cleaners

Table of Contents

<u>Section Topic</u>	<u>Page Number</u>
Section 1 - Introduction	1
How will this guidance help my dry cleaning business?	
Section 2 - Environmental Laws & Regulations	
State & Federal Air Regulations.....	2
State & Federal Water Regulations.....	13
State & Federal Waste Regulations.....	22
Section 3 - Other Law & Regulations	
Occupational Safety & Health Administration (OSHA) Regulation Highlights.....	40
Local Fire and Building Department Requirements.....	42
Emergency Community Right-To-Know Act (EPCRA) Regulations.....	44
Section 4 - Pollution Prevention	50
Section 5 - Dry Cleaner Scenario , Example of stepping through this guide to comply with the Colorado environmental regulations.....	56
Acme Cleaners APEN.....	60.1
Acme Cleaners Initial Notification Report.....	60.2
Acme Cleaners Compliance Report for Control Equipment.....	60.3
Acme Cleaners Consumption Records.....	60.4
Acme Cleaners Leak Inspection Records.....	60.5
Acme Cleaners Condenser Temperature Records.....	60.6
Example Zero Discharge Permit.....	60.7
Acme Cleaners EPA Form 8700-12.....	60.8
Acme Cleaners Hazardous Waste Manifest.....	60.9
Section 6 - Appendix Table of Contents	61
A: List of Colorado Industrial Wastewater Pretreatment Program Contacts.....	62
B: Colorado Local Pollution Prevention (P2) Network Contact List.....	66
C: List of Colorado Local Emergency Planning Committees.....	69

INTRODUCTION

SECTION 1 – How will this guidance help my dry cleaning business?

As a small business owner, you may not have the resources or the time to spend on identifying, reading, and understanding all of the environmental requirements that may affect your business. This guide will provide you information on how to comply with the most common regulations a dry cleaner will face when running his/her business.

Many small businesses often face the same problem of not knowing where to start regarding environmental compliance. This guide provides a starting point for you because it covers a wide range of regulations that potentially affect all dry cleaners in Colorado. This includes state and federal air, water, and waste environmental requirements. In addition, it covers 3 areas of requirements that usually are not found together in one guidance document. These areas are:

- Regulations under the Federal Emergency Planning and Community Right-To-Know Act.
- Responsibilities with your local fire and building departments.
- Occupational Safety and Health Administration (OSHA) requirements.

This guide is truly intended to be your one-stop compliance resource. In the event you have any questions regarding any section within this guide, you may call the numbers provided within the “Who do I talk to if I need more help?” area located at the end of each section in this guide.

In addition, a key feature in this guide is an example dry cleaner scenario that takes you through the requirements and also includes filled out example forms and reports. This example dry cleaner scenario offers practical instruction on how to comply with the guide’s detailed requirements.

SECTION 2

ENVIRONMENTAL LAWS & REGULATIONS

STATE & FEDERAL AIR REGULATIONS



Air Emissions



Why should a dry cleaner be concerned about air pollution?

Most dry cleaners in Colorado use either perchloroethylene (perc) or petroleum as their cleaning solvent. Whether perc or petroleum, uncontrolled solvent vapor emissions from dry cleaning operations are a potential source of air pollution and therefore these emissions are regulated according to the amount of solvent used. The Federal Environmental Protection Agency (EPA) created a special rule for perc dry cleaners as well as one for petroleum solvent cleaners. In addition, the State Air Pollution Control Division (division) has an Air Pollution Emission Notice (APEN)/Permit rule (Regulation No. 3) that virtually affects all perc dry cleaners and most all petroleum solvent cleaners (dependent upon the amount of solvent used).



How do I know what air regulations apply to me?

The regulations governing perc and petroleum are different. The majority of Colorado dry cleaners use perc and are regulated under the federal perc rule and the division's APEN/Permit rule. Petroleum dry cleaners may be subject to the federal petroleum solvent rule and may need an air permit depending on certain conditions (total dryer capacity and the amount of emissions respectively).

However, there are additional state air regulations that are common to both perc and petroleum dry cleaners (as well as all stationary sources that have emissions in Colorado). All dry cleaners must comply with odor requirements (Regulation No. 2) and visible emission opacity limitations (Regulation No. 1). As an affected dry cleaner, these requirements are written as conditions into your permit.

Basically, if odors are leaving your property and impacting your neighbors (you can smell odors from outside your shop), you may be in violation of the odor regulation. You can prevent odor problems by complying with your permit requirements (e.g., emission limitations and good housekeeping requirements). Opacity is the degree to which an air pollutant (e.g. smoke) obscures the view of an observer. Typically, opacity is not an issue for dry cleaners but the condition included in air permits is that emissions must not exceed 20 percent opacity.

Perc Dry Cleaners

If you use perc, then the federal perc rule applies to your shop. This rule's requirements include:

- r air pollution control equipment that keeps perc from going into the air,
- r regular inspections of the dry cleaning machines for leaks, and
- r testing of the air pollution control equipment to make sure it is operating properly.

Under the division's APEN/Permit rule, perc dry cleaners must automatically obtain a stationary source air permit since they are subject to the federal perc rule. As a result, they must file an APEN.

Petroleum Solvent Dry Cleaners

If you use petroleum you may be subject to the EPA Petroleum Dry Cleaners rule. Whether you are affected by this rule depends on your total dryer capacity (manufacturers' rated) and when your dryer(s) were installed (started operating). You must comply with this rule if your total drum capacity is equal to or greater than 84 pounds (38 kilograms) and you started operating or modified your existing operation (i.e., added a dryer that triggered the 84 pound capacity requirement) after December 14, 1982.

However, this federal petroleum rule includes an exemption. If you started operating a shop with a total drum capacity of 84 pounds or greater between December 14, 1982 and September 21, 1984, and your annual petroleum consumption level is less than 4,700 gallons then you are excluded from this rule.

Any petroleum dry cleaner that is subject to this federal petroleum rule must automatically obtain a permit under the division's APEN/Permit rule. If you are NOT subject to this federal petroleum rule, then you must determine whether you need an APEN and a permit based on the amount of petroleum you use.

Under the division's APEN requirements you must report your emissions of any criteria air pollutant or hazardous air pollutant (HAP) if they are equal to or greater than specific levels. For dry cleaners using petroleum solvents, the criteria pollutants of concern are volatile organic compounds (VOC). You must file an APEN if your emissions of VOC are equal to 1 ton or more per year in most metropolitan areas or equal to 2 tons or more of VOC per year in most rural areas.

NOTE: For a petroleum dry cleaner to emit 1 ton of VOC per year you would need to use approximately 295 gallons of petroleum per year. You would need to use approximately 590 gallons of petroleum per year to emit 2 tons of VOC per year.

If your emissions are equal to or greater than the 1 or 2 ton per year thresholds then you must report by submitting an APEN to the division. If your emissions are high enough to trigger the permit thresholds then your APEN will be processed as a permit (addressed in the following section).



Do I need a permit?

Perc Dry Cleaners

If you are a perc dry cleaner you are required to obtain a state air permit, regardless of the amount of perc you use. Perc dry cleaners must obtain a permit by filing an APEN. The APEN serves the following two functions:

1. It is an emission-reporting tool (for any emitted criteria air pollutant or any non-criteria hazardous air pollutant (HAP), which includes perc).
2. It starts the processing of your permit.

The division has created a specialized dry cleaner APEN/Permit form to simplify the permit process. A copy of this APEN can be obtained from the division's web site at: <http://www.cdphe.state.co.us/ap/download.html> or by calling the division's main number at 303-692-3100.

Once you have filled out your APEN you should mail it to the division at the following address:

Colorado Department of Public Health and Environment
Air Pollution Control Division, APCD-SS-B1
4300 Cherry Creek Drive South
Denver, Colorado 80246-1530

At the present time there is a \$119.96 APEN filing fee. The APEN is good for 5 years unless a change of equipment occurs or you have a significant change in your actual emissions.

Note: A significant change in Perc emissions is an increase in actual emissions of 50 percent or 5 tons per year, whichever is less. A significant change in petroleum solvent emissions is an increase in actual emissions of 5 percent or 1 ton per year, whichever is greater, in ozone non-attainment areas or 5 tons per year in ozone attainment areas.

Once your APEN is five years old, you must file an updated one, regardless of whether you made any changes in your operations. However, your permit is good forever unless you make a change in equipment or a significant change in emissions occurs. If you do have such changes, you must submit an updated APEN that reflects these changes (and \$119.96 for the filing fee) to the division. Subsequently, your updated APEN will be processed and your existing permit will be modified.

Petroleum Solvent Dry Cleaners

If you are a petroleum dry cleaner that is subject to the federal Petroleum Dry Cleaner Rule then you must obtain a permit from the division.

If you are not subject to this federal petroleum rule, then you must determine whether you need a permit based on the amount of petroleum you use. You are required to obtain a permit if your VOC emissions are equal to or greater than specific levels. These levels are dependent on where your shop is located. If you are located in a metropolitan area, you will need a permit if your VOC emissions are equal to or greater than 2 tons per year. However, if you are located outside a metropolitan area (rural area), you will need a permit if your VOC emissions are equal to or greater than 5 tons per year.

NOTE: For a petroleum dry cleaner to emit 2 tons of VOC per year you would need to use approximately 590 gallons of petroleum per year. You would need to use approximately 1,500 gallons of petroleum per year to emit 5 tons of VOC per year.

APEN/Permit Fees

As previously referenced above, the division requires a \$119.96 fee per APEN filed. In addition, the permit engineers charge a \$59.98/hour rate for processing your permit.

Your permit is processed and issued in two phases, first as an Initial Approval Permit and then as a Final Approval Permit. The division bills the applicant separately for the initial and final permits. So expect to receive two permit processing bills for the processing of your permit.

In addition, your APEN generates an annual emissions fee bill. Every year, around March, you will be mailed a bill based on your total amount of emissions. The bill is based on a fee for any criteria pollutant emitted, as well as, any HAP emitted (for dry cleaners VOC and perc respectively). The break out is as follows:

\$17.97/ton of criteria pollutants emitted, \$119.96/ton of HAPs emitted

Transfer of Ownership Agreement for Permits

A new owner purchasing an existing dry cleaning business may be able to simplify his/her permit process (save time and money with the permit processing) through a transfer of ownership. If the existing owner agrees to work with the new owner, the existing owner may authorize his/her permit to be transferred to the new owner. Transfers of ownership agreements are ideal for situations where the new owner will not be changing any of the operations at the shop (i.e., no new equipment or no increase in solvent usage). In order to conduct a transfer of ownership of the permit, the following forms must be completed:

- 1) "Transfer of Ownership Agreement" - To be completed by the previous and new owner.
- 2) "Air Pollutant Emission Notice (APEN) for Dry Cleaners" - To be completed and submitted with a \$119.96 filing fee by the new owner. Note: Indicate that a transfer of ownership has occurred.
- 3) "Administrative Permit Amendment Form" - To be completed by new owner.
- 4) Compliance Report for Control Equipment.

The new owner should submit all 4 forms together to the division. These forms may be obtained from the division's web site at: <http://www.cdphe.state.co.us/ap/download.html> or by calling the division's main number at 303-692-3100.

Dry cleaner owners may also choose to cancel their permit through written notification to the division when selling their business. In this case, it is up to the purchasing owner to obtain a new permit. A dry cleaner owner may cancel his/her permit by submitting a Permit Cancellation form when closing down his/her shop. This form may be obtained from the division's web site, as referenced above, or by calling the division's mail line at 303-692-3100.



What are my air pollution control requirements under the federal perc rule?

Pollution Control Equipment Requirements

For Perc dry cleaning, the type of control equipment you are required to use will depend on the following 3 factors:

- 1) whether you use a dry-to-dry or transfer system,
- 2) the date when your machine was installed, and
- 3) the amount of perc you use in a year.

Most perc dry cleaning machines are required to have a refrigerated condenser to reduce emissions of perc into the air. You are NOT required to have a refrigerated condenser (or any other pollution control equipment) if you meet both of the following conditions:

- r the machine was installed prior to December 9, 1991, and
- r the machine is a dry-to-dry unit that uses less than 140 gallons of perc per year
- or - the machine is a transfer system that uses less than 200 gallons per year
- r or - you use a combination of dry-to-dry and transfer machines that use less than 140 gallons of perc per year.

In addition, you are not required to have a refrigerated condenser (or any other pollution control equipment) if either condition applies:

- r your dry-to-dry machine was equipped with a carbon absorber (sniffer) prior to December 9, 1991 and uses less than 140 gallons of perc in a year (then you can keep the sniffer instead of installing a refrigerated condenser); or
- r your transfer system was equipped with a sniffer prior to September 23, 1996 and uses less than 200 gallons of perc in a year (then you can keep the sniffer instead of installing a refrigerated condenser).

Otherwise, you are required to use a refrigerated condenser under the federal perc rule.

NOTE: Transfer Systems - No new transfer systems can be used in any shops. It is all right to continue using a transfer system if the system was installed prior to September 23, 1996. No new air pollution control equipment is required for transfer systems installed prior to September 23, 1996 that use less than 200 gallons per year.

Housekeeping Requirements

- No dry cleaner may dispose of perc by evaporation or spillage except as described in the section ahead entitled "Guidelines for Evaporator Systems for the State of Colorado".
- All dry cleaners must store and dispose of perc in sealed containers.
- All dry cleaners must drain filters for at least 24 hours prior to disposal.
- The federal perc rule requires a weekly inspection for leaks for all dry-to-dry machines that use more than 140 gallons of perc per year and for transfer units that use more than 200 gallons of perc per year. For shops that use less than these amounts leak inspection must be performed every two weeks.

Monitoring Requirements

The federal perc rule requires weekly testing (also referred as monitoring) of pollution control equipment. The types of monitoring you do depend on whether you have a refrigerated condenser or a sniffer.

- Refrigerated Condenser: You must measure the temperature of the air leaving the condenser. The temperature shall not exceed 45 degrees F (or 7E C).
- Sniffers: You must test the concentration of perc leaving the unit. The concentration shall not exceed 100 parts per million by volume.

For help on how to perform these tests, please call the Small Business Assistance Program (phone numbers provided in the "Who do I talk to if I need more help?" section).



What are my reporting and record-keeping responsibilities under the federal perc rule?

Reporting Responsibilities

All dry cleaners that are subject to the federal perc rule should have received, completed and submitted the following reporting forms to the EPA:

- 1) Initial Notification Report: This form informs the EPA that your dry cleaner business exists and whether the federal perc rule applies to you or not. The deadline submittal date was December 20, 1993.
- 2) Compliance Report: Lists the type of control equipment you use, such as a refrigerated condenser or a sniffer.

If you are a brand new dry cleaner you should submit these reports with your APEN/Permit application. These reports can be obtained from the division's web site at: <http://www.cdphe.state.co.us/ap/download.html> or by calling the division's main number at 303-692-3100.

If you have not submitted either of these reports to the EPA, please call the Colorado Small Business Assistance Program (SBAP) at the numbers listed below. The SBAP will gladly assist you with completing these reports. It is important that you submit these reports in order to be in full compliance with the federal perc rule.

Record Keeping Requirements

Many small businesses, such as dry cleaners, experience problems with complying with their record keeping requirements. Whether it is a time or personnel resource hardship, it can be difficult to maintain the various records required of dry cleaners. To be in compliance with the perc rule, it is critical that you record and keep the following records at your shop:

1. Record the amount of perc purchased each month and keep the records for the preceding 12-month period at all times. This is considered to be your annual usage of perc.

2. Keep a record of leak inspections that shows the date on which each inspection is performed. If leaks are detected, keep a record of when repairs were made, and when replacement parts were ordered and installed.
3. Keep a record of when pollution control equipment monitoring was performed, including the date of each test and the temperatures (for refrigerated condensers) or perc concentrations (for sniffers).

Guidelines for Evaporator Systems for the State of Colorado - (This is a state policy created by the Air Pollution Control Division in 1992.)

In most areas of Colorado, water from a dry cleaning machine's water separator cannot be emptied down a drain. The wastewater treatment plants simply cannot handle having perc in their systems and there is substantial risk of soil contamination if you have a leaky sewer line. Dry cleaners can use a water evaporator to get rid of the separator water.

There are 2 guidelines that an evaporator must meet:

- 1) Before water can be processed in an evaporator it must be first processed in a dry cleaning machine's water/perc separation system.
- 2) The evaporation system must contain a built-in "failsafe" mechanism. A failsafe system does not allow excessive amounts of solvent to be placed in the evaporator. Typically the failsafe mechanism is an alarm or shutoff system, which is triggered by excess solvent in the water.

It is absolutely necessary, as with any pollution control related equipment, that the operator follows the manufacturers recommendations concerning proper operation.

NOTE: The evaporation of perc contained wastewater may trigger hazardous waste treatment permit requirements. Thus, you should contact the Hazardous Materials Waste Materials Division at 303-692-3320 prior to evaporating your wastewater.



Who do I talk to if I need more help?

Colorado Small Business Assistance Program:

(303) 692-3148

If you are unable to reach someone at the above numbers, you may call the main number for the division at (303) 692-3100.

Colorado Air Pollution Small Business Ombudsman:

(303) 692-2034 or 1-800-886-7689 (in-state callers only)

If you are unable to reach someone at the above number, you may call the main information line for the Office of Customer Service at (303) 692-2035.



Where can I find additional information?

Colorado Small Business Assistance Website

<http://www.cdphe.state.co.us/ap/sbap.asp>

Colorado Small Business Ombudsman Website

<http://www.cdphe.state.co.us/ic/sbomain1.html>

Rocky Mountain Fabricare Association

<http://www.rmfa.org>

EPA Small Business Environmental Website

<http://www.smallbiz-enviroweb.org/>

U.S. Small Business Administration, Office of the National Ombudsman - RegFair Program

<http://www.sba.gov/regfair>

EPA Design for the Environment (DfE) Garment and Textile Care Program Website

<http://www.epa.gov/dfe/garment/garment.html>

National Clothesline Website: Provides news and information needed by garment care professionals to be successful in a rapidly changing industry.

<http://www.natclo.com/>

SECTION 2
ENVIRONMENTAL LAWS & REGULATIONS

**STATE & LOCAL WATER
REGULATIONS**



Wastewater



Why should a dry cleaner be concerned about wastewater?

Besides common sanitary waste, which is discharged by most businesses, dry cleaning shops routinely generate process contact water. Process contact water is water that has been in contact with cleaning solvents or other hazardous chemicals, which may be dissolved in small quantities in the water. Some examples are separator water, vacuum water, and boiler blow-down contaminated with perchloroethylene or petroleum solvents.

When dry cleaning solvents are improperly discharged or disposed of, as might occur with malfunctioning equipment leaking to a floor drain or leaking sewer lines, these chemicals have the potential of causing problems to your community's wastewater treatment plant or to the surrounding environment. Even though these releases may have occurred accidentally, you may still be responsible for the clean up of any resulting groundwater or soil contamination.



How do I know what wastewater regulations apply to me?

To determine which wastewater requirements apply to your dry cleaning shop, you first need to determine where your wastewater goes. There are generally three possible scenarios:

1. The wastewater from your shop drains directly into a storm sewer, river, stream, lake or ditch; or
2. The wastewater from your shop drains directly into a shallow disposal system, a dry well, sump, or an ordinary septic system; or
3. The wastewater from your shop drains directly into a sewer system that is routed to a wastewater treatment plant.

Most shops in Colorado fall under scenario number 3 and are connected to a wastewater treatment plant. The wastewater treatment plant treats the wastewater and then discharges the treated water into a river, lake, stream or other water body. Unfortunately, each wastewater treatment plant has different design and operating parameters and you must contact them directly to determine your specific discharge requirements.



Do I need a permit?

In order to determine your wastewater permitting requirements, you must determine where your wastewater goes. Most dry cleaner shops with water supplied by a local water utility (city or water district) will discharge their wastewater from toilets and sinks, and process wastewater, such as separator water, to a sanitary sewer system. Normally, dry cleaning shops are viewed as small dischargers, and are not required to apply for discharge permits. If your shop discharges process wastewater (separator water or other process-related wastewater from sources other than toilets and bathroom sinks) you should contact your local pretreatment coordinator or your wastewater treatment plant to determine if you are required to obtain a discharge permit. A pretreatment coordinator contact list is provided in Appendix A.

Before contacting your pretreatment coordinator you should first determine the types of wastewater that you generate. First, you should determine the amount (gallons per day) of each of the various wastewater types (i.e., process wastewater) you generate at your shop. Then you should determine the concentration of pollutants (such as perchloroethylene or hydrocarbon solvent) expected to be present in each type of wastewater you generate.

Many communities, such as the metropolitan Denver area, have established a zero discharge permit requirement for dry cleaning shops, which prohibits any process wastewater discharges to the sewer system. Thus, most dry cleaner shops in the metropolitan Denver area will need to obtain a zero discharge permit.

Before you discharge process wastewater from your shop directly into a storm sewer, river, stream, lake or ditch you are required to obtain an industrial wastewater discharge permit from the Department's Water Quality Control Division. To find out more information regarding industrial wastewater discharge permits please call the Water Quality Control Division at (303) 692-3500.

It's generally not practical for a dry cleaner to obtain an industrial wastewater discharge permit and you should attempt to divert wastewater discharges from storm sewers, rivers, streams, lakes or ditches into a local wastewater treatment plant system to avoid this very burdensome permitting requirement.

If you discharge process wastewater from your shop directly into a shallow disposal system, a dry well, sump, or an individual sewage disposal system (ordinary septic system) you may be required to obtain a groundwater discharge permit from the Water Quality Control Division. If you are constructing a new individual sewage disposal system you are required to obtain an individual sewage disposal system permit from your local county health department.

If your wastewater contains chemical contaminants, such as perchloroethylene or hydrocarbon solvents, or your wastewater contaminants do not biodegrade it will be very difficult for you to obtain one of these permits. Thus, you should attempt to divert your wastewater discharges from the septic system, disposal wells or sumps into the local wastewater treatment plant system to avoid this difficult permitting process. Again, be sure to contact your local wastewater treatment plant before discharging any process wastewater into the sanitary sewer.



What are my general wastewater requirements?

Dry Cleaners must practice safe handling of dry cleaning solvents to avoid unauthorized discharges and environmental contamination problems. The purpose of the wastewater regulations is to prevent the discharge of pollutants, such as perchloroethylene or petroleum solvent, to the environment or to a wastewater treatment plant. Doing so could:

- r Cause contamination of soil and groundwater.
- r Cause contamination in lakes and rivers.
- r Interfere with operation of the wastewater treatment plant.
- r Pass through a treatment plant untreated and impact receiving surface water.
- r Create problems with the disposal of sludge from the treatment plant.
- r Cause problems to treatment plant or sewer system workers from exposure to chemicals.

You are prohibited from discharging materials into the sewer that:

- U Pose a fire or explosion hazard in the sewer system;
- U Have the potential to obstruct the flow in the sewer system;
- U Has excessive color (dye waste);
- U Have extreme pH values (generally below 5 or above 9);
- U Have excessive petroleum or oil and grease concentrations;
- U Have an elevated temperature (generally above 104 degrees F); and
- U Contain toxic substances such as heavy metals, pesticides or other compounds, which may interfere with treatment plant operations.

In districts that prohibit the discharge (zero discharge permits) of dry cleaning wastewater into their sewer system you may be required to ensure the following:

- r Ensure that all dry cleaning processes, including separator water discharge lines, are not connected to the sanitary sewer system.
- r Ensure that all floor drains are permanently sealed, or berms (physical barriers) are installed to separate dry cleaning machines and solvent use areas from the floor drains.
- r Ensure that all solvents, including waste solvents, are safely stored, labeled and located away from sewer discharge points.
- r Ensure that all waste materials are placed in appropriate containers for collection and proper disposal.
- r Post a discharge prohibition sign in the work area to advise employees of the prohibition of discharge and who to call in the event of an accidental discharge.

Additionally, you should consider doing the following to help prevent accidental discharges from your shop:

Spill Response and Recovery

- r Obtain a supply of absorbent cotton blankets and keep them in a specially marked container near the areas where solvent is used or stored.
- r If a spill occurs, use the blankets to absorb the spill. Then run them through the machine to recover the solvent.

For additional information on spill reporting requirements, please see the Emergency Planning and Community Right-To-Know regulations in Section 3.

Flooring Construction

- r The floor under the dry cleaning equipment and solvent storage area should be concrete that is protected with a suitable solvent resistant coating. If there is a doorway near this area, there should be a coated concrete barrier to prevent solvent from flowing out the door in case of a major spill.
- r Cap or plug floor drains in the vicinity of hazardous chemicals or install physical barriers (berms) to separate dry cleaning machines and solvent use areas from the floor drains.

Solvent Delivery and Handling

- r Hose delivery can be dangerous. In the event of an equipment failure, such as fitting leaks, hose breaks or the nozzle slips out of the tank, a major spill can occur. Always supervise any transfer of solvent on your premises. The final responsibility is always yours.
- r A safer way is to accept delivery of your solvent in small drums, preferably with a direct coupled, closed loop, vapor recovery system to transfer the solvent into your machine. Several companies have introduced such systems, which reduce the potential for spills/leaks and eliminate vapor emissions.

Secondary Containment

- r A containment tray is a structure that goes under and around the machine, filters, still and any tank which contains solvent. It will control leaks from a button trap, an open door, a cracked base tank or any similar occurrence. Containment should always be installed when a new plant is built, but retrofits are possible and strongly advised.
- r A containment tray should be non-porous, made of epoxy-coated concrete, fiberglass, steel or other suitable material, and be capable of holding 110% of the solvent tank located above it.

Separator Water

- r Keep your water separators cleaned out and well maintained. While some separator designs are more prone to malfunction than others, even new or well-designed water separators become problematic when poorly maintained.
- r Monitor the temperature settings on your water separator. Improper high temperatures in the water separator can cause pure solvent to spill over into the receiving vessels, which accumulates in the wastewater for discharge. This is known as “burping” and results in high concentrations of solvent in the wastewater. The cooler you can keep your water separator, the better. Some water separators are water-cooled, and many are equipped with a temperature gauge. Ideally, you want to keep your separator cooler than 85° F.

Do I have any Monitoring Requirements?

Because the wastewater treatment plant must know what is being discharged into its treatment plant, the treatment plant operator may require dischargers to periodically sample their wastewater and report the results. For small businesses, such as dry cleaners, which are not familiar with how to collect and analyze wastewater samples, the treatment plant operator may often do the sampling for you.



What are my wastewater reporting and record-keeping responsibilities?

You local wastewater treatment plant or the conditions of your wastewater discharge permit may require you to periodically report on the following:

- U Characteristics of your typical discharge.
- U Description of stored chemicals.
- U Equipment inspection and maintenance schedules.
- U Reporting of potential problems, including unusually large discharges (slugs) and spills.
- U Notification of hazardous waste discharges.
- U Substantial changes in your wastewater discharge.

Additionally, you may be required to maintain the following records:

- ✓ Monitoring results for discharge rates.
- ✓ Receipts of all solvent purchases and all waste disposal manifests and/or receipts.
- ✓ Wastewater sampling records, if the wastewater treatment plant or your wastewater discharge permit requires sampling. (This generally includes the date and time of sampling, the names of the individual who collected the sample and the name of the laboratory that analyzed the sample or samples along with the analytical techniques/methods used.)



Who do I talk to if I need more help?

For further assistance in understanding the wastewater regulations applicable to you, please contact the Department's Water Quality Control Division at (303) 692-3500 or your local pretreatment coordinator or wastewater treatment plant. You will find a list of the Colorado Pretreatment Coordinators in Appendix A.



Where can I find additional information?

Colorado Department of Public Health and Environment
Water Quality Control Division

<http://www.cdphe.state.co.us/wq/wghom.asp>

Colorado Industrial Pretreatment Coordinators Association

<http://www.ci.englewood.co.us/wwtp/CI PCA/CI PCAhome.htm>

Environmental Protection Agency - Region 8, Industrial Pretreatment Program

<http://www.epa.gov/region08/water/wastewater/prethome/prethome.html>

Environmental Protection Agency, Office of Wastewater Management / Index

<http://www.epa.gov/owm/pdprog.htm>

SECTION 2
ENVIRONMENTAL LAWS & REGULATIONS

**STATE & FEDERAL WASTE
REGULATIONS**



Hazardous Waste



Why should a dry cleaner be concerned about waste?



Dry cleaning shops that use perchloroethylene or petroleum solvents as cleaning agents generate hazardous waste. All facilities generating hazardous waste are regulated under the Colorado Hazardous Waste Act and its implementing regulations, which are found in section 6-1007-3, parts 99, 100, and 260 - 279 of the Colorado Code of Regulations. These regulations cover the generation, transportation, and disposal of hazardous waste.

Common Types of Dry Cleaning Hazardous Waste

The universe of hazardous waste is divided into the following two categories:

1. "Listed Waste": Your waste is considered a listed hazardous waste if it appears on one of four lists (F, K P or U lists) published in the Colorado Code of Regulations (6 CCR 1007-3, Part 261). Currently, more than 400 wastes are listed. Listed wastes are identified as hazardous because they are known to be harmful to human health and the environment when not managed properly. Two common dry cleaning listed wastes are:

- F002 - Spent Halogenated Solvents: including tetrachloroethylene (perchloroethylene); all spent solvent mixtures/blends containing, before use, a total of ten percent or more (by volume) of one or more of the above halogenated solvents or those listed in F001, F004, or F005; and still bottoms from the recovery of these spent solvents and spent solvent mixtures.

- U210 - Tetrachloroethylene (*perchloroethylene*) /Unused Commercial Chemical Product

2. "Characteristic Wastes": If your waste does not appear on one of the hazardous waste lists, it still might be considered hazardous if it exhibits one or more of the following characteristics:

- It catches fire under certain conditions. This is known as an **"ignitable"** waste. Examples are paints and certain degreasers and solvents, including most dry cleaning petroleum solvents.

It corrodes metals or has a very high or low pH. This is known as a **"corrosive"** waste. Examples are rust removers, acid or alkaline cleaning fluids, and battery acid.

It is unstable and explodes or produces toxic fumes, gases, and vapors when mixed with water or under other conditions such as heat or pressure. This is known as a **"reactive"** waste. Examples are certain cyanides or sulfide-bearing wastes.

It is harmful or fatal when ingested or absorbed, or if it leaches one of forty identified toxic chemicals into the soil or ground water when disposed of on land. This is known as a **"toxic"** waste. Examples are wastes that contain high concentrations of heavy metals, such as cadmium, lead, or mercury or wastes that contain perchloroethylene or trichloroethylene. You can determine if your waste is toxic by having it tested using the Toxicity Characteristic Leaching Procedure (TCLP).

The following (while not exhaustive) is a list of hazardous wastes that dry cleaners commonly produce. In general, any dry cleaning waste that is contaminated with perchloroethylene or has a flash point less than 140 degrees F is regulated as a hazardous waste.

- still residues ("sludge") from perchloroethylene distillation, (hazardous waste codes F002 and D039)
- still residues ("sludge") from petroleum solvent distillation, (hazardous waste code D001)
- spent filter cartridges contaminated with perchloroethylene solvent (hazardous waste codes F002 and D039)
- spent perchloroethylene solvent (hazardous waste codes F002 and D039)
- spent petroleum solvent (hazardous waste code D001)
- process water (such as separator water) that is contaminated with perchloroethylene (hazardous waste codes F002 and D039)
- filter coating and cooked powder residue ("filter muck") containing perchloroethylene (hazardous waste codes F002 and D039)
- unused perchloroethylene (hazardous waste codes U210 and D039)
- waste activated carbon contaminated with perchloroethylene solvent (hazardous waste codes F002, U210 and D039)
- cleanup residues from perchloroethylene spills (hazardous waste codes U210, F002 and D039)
- dryer or washer lint contaminated with perchloroethylene solvent (hazardous waste codes F002 and D039)



How do I know what waste regulations apply to me?

Hazardous Waste Generators are divided into three categories: **Conditionally Exempt Small Quantity Generators (CESQGs)**; **Small Quantity Generators (SQGs)**; and **Large Quantity Generators (LQGs)**. Both the quantity of hazardous waste generated each month and the cumulative amount of hazardous waste accumulated at the facility at any time determines which category a facility belongs to.

The monthly limit is the measured amount (by weight) of hazardous waste generated at each facility per calendar month. It includes all the hazardous wastes that are generated at the facility. The monthly quantity of hazardous waste generated at a facility determines the applicable requirements.

The cumulative amount of hazardous waste accumulated is the total weight of hazardous waste that can be accumulated at any time at a dry cleaning facility before it must be shipped off site. Exceeding the accumulation limits can cause a facility to change generator categories and, therefore, change the applicable regulatory requirements.

Please refer to the following table to determine what generator category applies to your shop:

HAZARDOUS WASTE GENERATOR CATEGORIES			
<u>Category</u>	Conditionally Exempt Small Quantity Generator (CESQG)	Small Quantity Generator (SQG)	Large Quantity Generator (LQG)
Waste Produced Each Month	≤100 kg (220 pounds or ≈ 25 gallons)	>100 kg (220 pounds or ≈ 25 gallons) but <1000 kg (2200 pounds or ≈ five 55-gallon drums)	≥1000 kg (2200 pounds or ≈ five 55-gallon drums)
Maximum Accumulation Quantity	1000 kg (2200 pounds or ≈ five 55-gallon drums)	6000 kg (13,200 pounds or ≈ thirty 55 gallon drums)	No limit

How do you count the quantity of hazardous waste that you generate?

You **MUST** count all quantities of hazardous wastes that are:

- ✓ Accumulated on the property for any period of time before disposal or recycling. (Dry cleaners, for example, must count any residue removed from machines, as well as, spent cartridge filters.)
- ✓ Packaged and transported away from your business.
- ✓ Placed directly in a regulated treatment or disposal unit at your place of business.
- ✓ Generated as still bottoms or sludges and removed from product storage tanks.

DO NOT count wastes that:

- ✓ Are specifically exempted from counting. Examples include lead-acid batteries that will be reclaimed, scrap metal that will be recycled, used oil being recycled and wastes being managed as universal hazardous wastes. (E.g., batteries, aerosol cans, pesticides, thermostats, and mercury-containing lamps).
- ✓ Might be left in the bottom of containers that have been thoroughly emptied through conventional means such as pouring or pumping.
- ✓ Are left as residue in the bottom of product storage tanks, if the residue is not removed from the storage tank.
- ✓ Are dry cleaning solvents which are reclaimed continuously on site without storing prior to reclamation and which have already been counted once during the calendar month.
- ✓ Are managed in an "elementary neutralization unit," a "totally enclosed treatment unit," or a "wastewater treatment unit," without being stored first.
- ✓ Are discharged directly to publicly owned treatment works (POTWs) without being stored or accumulated first. Discharges to a POTW must comply with the Water Quality Control Division's wastewater regulations (see the "Wastewater" section on page 13). POTWs are public utilities, usually owned by the city, county, or state, which treat industrial and domestic sewage for disposal.

*** Dry Cleaner Trivia ** - perchloroethylene weighs 13.5 pounds per gallon*

Is it Possible for a Generator to Change Categories?

Depending on how your shop operates, you might be regulated under different generator categories at different times. If, for example, you generate less than

220 lbs. (100 kg) of hazardous waste during the month of June, you would be considered a CESQG for June and your June waste would be subject to the hazardous waste management requirements for CESQGs. If in July, you generate between 220 and 2,200 lbs. (100 kg to 1,000 kg) of hazardous waste, your generator status would change, and you would be considered a SQG for July. Your July waste would then be subject to the management requirements for SQGs.

If you change generator categories, the Hazardous Material and Waste Management Division must be notified in writing of the change. You should file an updated notification at the same time that the annual Hazardous Waste Commission Fee is due, which is in the fall. The updated notification (which can be a written letter) should include the site name and address, EPA identification number (see the following section for this requirement), ownership information, and a brief explanation of the category change. This notification change should be submitted to the Hazardous Materials and Waste Management Division at the following address:

Colorado Department of Public Health and Environment
Hazardous Materials and Waste Management Division
4300 Cherry Creek Drive South (HMWMD-B2)
Denver, Colorado 80246-1530

In many cases, dry cleaning shops that fall into different generator categories at different times choose to remain in the most stringent category (and thus comply with the more stringent requirements) to simplify compliance.



Do I need a permit?

Most dry cleaners do not need a hazardous waste permit. Hazardous waste permits are issued for treatment, storage and disposal of hazardous waste. You may need a hazardous waste permit if you do any of the following activities:

- r** Store your hazardous waste longer than your generator status allows.
- r** You are a Small Quantity Generator or Large Quantity Generator who treats hazardous waste. (Treatment means evaporation, solidification, etc.)
- r** Dispose of your hazardous waste on-site. (Disposal such as burying and dumping.)

If you do any of these activities, you should contact the Hazardous Materials and Waste Management Division at (303) 692-3300 to determine what your requirements are for obtaining a hazardous waste permit.

EPA Identification Numbers

Although most dry cleaners do not need permits, small quantity generator and large quantity generator dry cleaners must obtain an EPA identification number to manage their hazardous wastes. Conditionally exempt small quantity generators do not need to obtain an EPA identification number. However, many transporters and treatment, storage, and disposal facilities will not accept hazardous waste from a generator, regardless of category, without an EPA identification number.

A unique EPA identification number is assigned for each plant site or facility that generates hazardous waste in excess of 100 kg (or 1 kg of acutely hazardous waste) in any calendar month, and/or that accumulates more than 1000 kg of hazardous waste on the property at one time. If a generator has more than one facility that generates hazardous waste an EPA identification number must be obtained for each facility.

Transporters and facilities that store, treat, or dispose of hazardous waste must also obtain an EPA identification number.

How does a Dry Cleaner obtain an EPA ID number?

A dry cleaner may obtain an EPA identification number by first requesting a copy of the "Notification of Regulated Waste Activity" booklet from the Hazardous Materials and Waste Management Division. This booklet contains a copy of EPA Form 8700-12 and instructions for filling it out. The completed form should be returned to the Hazardous Materials and Waste Management Division. The generator will be notified of the number issued to them as soon as practicable.

What if the shop ownership changes?

The EPA identification number is assigned to the facility and stays with the shop. If a dry cleaner changes ownership, a revised Form 8700-12 should be submitted to notify the Hazardous Materials and Waste Management Division of the change in ownership. The shop's EPA identification number will not change.

What must be done if a dry cleaner shop no longer generates hazardous waste?

If your shop no longer generates hazardous waste (e.g., you are closing your business or you are switching to a non-hazardous cleaning solvent), the Hazardous

Materials and Waste Management Division should be notified in writing. You should send a letter to the division, which includes the site name and address, EPA identification number, ownership information, and a brief explanation of why the facility no longer generates hazardous waste.

Be sure to keep your EPA identification number active until you have completely closed your business and/or completed any environmental cleanups as these activities may generate additional hazardous waste.

What if a dry cleaner shop moves to another location?

You must notify the Hazardous Materials and Waste Management Division of your new location and submit a new EPA Form 8700-12. Your new shop will receive a new EPA identification number.

Don't forget! You must also notify the Hazardous Materials and Waste Management Division in writing that you no longer generate hazardous waste at your old shop location or that there was a change in ownership for the old shop.



What are my general waste handling requirements?

The hazardous waste generator regulations outline requirements for the storage and handling, treatment, and disposal of hazardous waste, from the time the hazardous waste is generated until its final disposal. You, the generator, are responsible for all steps. Following is an overview of the hazardous waste generator requirements that are found in the Colorado Hazardous Waste Regulations, 6 CCR 1007-3, part 262.

Waste Accumulation

Accumulating hazardous waste on site can pose a threat to human health and the environment, so you may only keep it for a short time without a permit. The following table outlines the generator accumulation time periods for each generator category.

HAZARDOUS WASTE GENERATOR ACCUMULATION LIMITS		
Conditionally Exempt Small Quantity Generator (CESQG)	Small Quantity Generator (SQG)	Large Quantity Generator (LQG)
No time limit until 1000 kg (2200 pounds or ≈ five 55 gallon drums) is reached	180 days or 270 days if TSDF >200 miles away (30 day extension available)	90 days (30 day extension available)

Exceeding the accumulation time or quantity limits can cause a facility to change generator categories and, therefore, change the applicable regulatory requirements. The Hazardous Materials and Waste Management Division may grant limited extensions. If you are interested in obtaining an extension you may call the division at (303) 692-3300.

Please note if you exceed these limits, you may be considered a storage facility and be required to obtain a hazardous waste storage permit.

Hazardous Waste Management for Conditionally Exempt Small Quantity Generators

Conditionally Exempt Small Quantity Generators (CESQG) waste handling requirements are not as stringent as the other two categories. CESQG must comply with three basic waste management requirements to remain exempt from most of the hazardous waste regulations that apply to generators of larger quantities (SQGs and LQGs).

1. Properly identify all hazardous waste.
2. Never accumulate more than 1000 kg (2200 pounds or ≈ five 55 gallon drums) of hazardous waste.
3. Ensure proper treatment and/or disposal of generated waste.

While conditionally exempt from most of the hazardous waste requirements, a CESQG often chooses to follow all or part of the requirements for larger generators, such as labeling and personnel training, as a good management practice.

Hazardous Waste Management for Small and Large Quantity Generators

Before shipping your waste for disposal or recycling, you are responsible for its safe management, which includes safe storage, safe treatment, preventing accidents, and properly responding to emergencies.

You may accumulate your dry cleaning waste only in containers or in tanks.

If you accumulate hazardous waste in containers, such as a 55-gallon drum, you must:

- U** Label each container with the words **"HAZARDOUS WASTE"**, and mark each container with the date the waste was generated.
- U** Use a container made of, or lined with, a material that is compatible with the hazardous waste to be stored. *(This will prevent the waste from reacting with or corroding the container.)*
- U** Keep all containers holding hazardous waste closed during storage, except when adding or removing waste. Do not open, handle, or store (stack) containers in a way that might cause them to leak or otherwise fail.
- U** Inspect areas where containers are stored at least weekly, looking for leaks and/or deterioration caused by corrosion or other factors.
- U** Maintain the containers in good condition. If a container leaks, promptly repackage the hazardous waste in another container.
- U** Do not mix incompatible wastes or materials unless precautions are taken to prevent hazardous reactions.

If you accumulate hazardous waste in tanks you must:

- U** Label each tank with the words **"HAZARDOUS WASTE"**.
- U** Store only waste that will not cause the tank or the inner liner of the tank to rupture, leak, corrode, or fail.
- U** Equip tanks that have an automatic waste feed with a waste feed cutoff system, or a bypass system for use in the event of a leak or overflow.

- U Inspect discharge control and monitoring equipment and the level of waste in uncovered tanks at least once each operating day. Inspect the tanks and surrounding areas for leaks or other problems (such as corrosion) at least weekly.
- U Use the National Fire Protection Associations (NFPA's) buffer zone requirements for covered tanks containing ignitable or reactive wastes. These requirements specify distances considered to be safe buffer zones for various ignitable or reactive wastes.
- U Do not mix incompatible wastes or materials unless precautions are taken to prevent hazardous reactions.
- U Do not place ignitable or reactive wastes in tanks unless certain precautions are taken.
- U Provide at least two feet (60 centimeters) of freeboard (space at the top of each tank) in uncovered tanks, unless the tank is equipped with a containment structure, a drainage control system, or a standby tank with adequate capacity.

Hazardous Waste Personnel Training

Shop owners must ensure that all employees are thoroughly familiar with proper waste handling and emergency response procedures relevant to their job responsibilities. It is suggested that a written training plan and a roster of employees' names, dates of training, and signatures documenting completion of training be kept on file to prove compliance with the training requirements.

Large quantity generators have very specific training requirements which are explained in detail in the Hazardous Materials and Waste Management Division's guidance document titled *"Personnel Training for Large Quantity Generators of Hazardous Waste"*. This document is available on the Internet at <http://www.cdphe.state.co.us/hm/lqgttext.pdf> or can be obtained from the Hazardous Materials and Waste Management Division by calling (303) 692-3300.

Emergency Response Procedures and Hazardous Waste Contingency Plans

Whenever you store hazardous waste on site, you must minimize the potential risks from fires, explosions, or other accidents. You should maintain sufficient aisle space to permit the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of the shop and ensure that personnel handling hazardous waste have immediate access

to an alarm or emergency communication devices.

You should have the following emergency response information posted next to your telephone.

Emergency Coordinator	Name:
	Telephone:
Fire Extinguisher	Location(s):
Spill Control Materials	Location(s):
Fire Alarm (if present)	Location(s):
Fire Department	Telephone: 911 or (XXX) XXX-XXXX

In the event of a spill: You should contain the flow of hazardous waste to the maximum extent possible, and as soon as is possible, clean up the hazardous waste and any contaminated materials or soil.

In the event of a fire: Call the fire department and, if safe, attempt to extinguish the fire using a fire extinguisher.

In the event of a fire, explosion, or other release that could threaten human health outside the facility, or if you know that the spill has reached surface water, you should immediately call your local emergency response authority, generally " 911", and the National Response Center at (800) 424- 8802 and provide them with the following information:

- t Company name:
- t Address where incident occurred:
- t EPA identification number:
- t Date of accident:
- t Time of accident:
- t Type of accident (e.g., spill or fire):
- t Quantity of hazardous waste involved:
- t Extent of injuries, if any:
- t Estimated quantity and disposition of recovered materials, if any:

Certain spills must also be reported to the Department. You may contact the Emergency Management Program at **877-518-5608, toll-free, 24-hours a day** to report a spill to the Department and/or to receive emergency assistance information.

Note: For additional information on spill reporting requirements, please see the EPCRA regulations in Section 3.

Small quantity generators that accumulate hazardous waste on site must be equipped with the following equipment:

- ✓ An internal communications or alarm system capable of providing immediate emergency instruction (voice or signal) to all personnel.
- ✓ A device, such as a telephone (immediately available at the scene of operations) or a hand-held two-way radio capable of contacting emergency assistance from local police and fire departments or emergency response teams.
- ✓ Portable fire extinguishers, spill control materials, and decontamination supplies.
- ✓ Water at adequate volume and pressure to supply water hose streams, foam-producing equipment, automatic sprinklers, or water spray systems.

You must test and maintain all equipment to ensure proper operation. Additionally, you should discuss your operations with and secure arrangements with fire departments, police, emergency response teams, equipment suppliers, and local hospitals, as appropriate, to provide services in the event of an emergency.

Large quantity generators have very specific contingency plan and emergency response requirements that are explained in detail in the Hazardous Materials and Waste Management Division's guidance document titled *"Preparedness and Prevention, Contingency Plan, Emergency Procedures for Large Quantity Generators of Hazardous Waste"*. This document is available on the Internet at <http://www.cdphe.state.co.us/hm/lqgcplan.pdf> or can be obtained from the division by calling (303) 692-3300.

Satellite Accumulation Areas

A satellite accumulation area is an area at or near the point of hazardous waste generation where limited amounts of hazardous waste can be stored temporarily. Satellite accumulation provisions apply only to Small Quantity Generators and Large Quantity Generators. They allow a generator to accumulate up to 55 gallons of hazardous waste in properly labeled containers at or near its point of generation and under the control of the operator of the process generating the waste. Once the quantity of waste stored in the container(s) has exceeded 55 gallons, the container(s) must be properly labeled and dated. The generator then must remove the container(s) from the satellite accumulation area and place them in a designated hazardous waste accumulation area (90 or 180 day area).

Satellite accumulation requirements are explained in detail in the Hazardous Materials and Waste Management Division's guidance document titled *"Satellite Accumulation for Small and Large Quantity Generators of Hazardous Waste"*. This document is available on the Internet at <http://www.cdphe.state.co.us/hm/satellit.pdf> or can be obtained from the Hazardous Materials and Waste Management Division by calling (303) 692-3300.

Shipping Waste Off-Site

You must properly package, label, and mark all hazardous waste shipments, and placard the vehicles in which these wastes are shipped following United States Department of Transportation (USDOT) regulations. Most small businesses use a commercial transporter to ship hazardous waste. These transporters can advise you on specific requirements for placarding, labeling, marking, and packaging; however, you remain responsible for compliance. For additional information, consult the USDOT regulations (49 CFR Parts 172 and 173), or call the USDOT hazardous materials information line at (800) 467-4922 Monday through Friday from 9:00 am to 5:00 pm (EST).

Preparing Hazardous Waste Manifests & Waste Shipping

If you are a Small Quantity Generator or a Large Quantity Generator, a hazardous waste manifest must accompany all hazardous waste that is shipped off from your shop. A hazardous waste manifest is a multipage form designed to track hazardous waste from generation to disposal. It will help you to track your waste during shipment and ensures that it arrives at the proper destination.

If the state to which you are shipping your waste requires its own manifest, you must use that state's form. Colorado does not have its own manifest form so you can use the Federal Uniform Hazardous Waste Manifest, EPA Form 8700-22, when shipping waste within Colorado (or to another state that does not require its own manifest form). To obtain manifest forms, contact the appropriate state hazardous waste management agency (for states that have their own form), your transporter, or the treatment, storage or disposal facility that you intend to use. The Hazardous Materials and Waste Management Division does not provide manifest forms.

You must fill in all sections of a manifest form which includes: name of transporter, name of the designated facility, your EPA ID number, and a description of the waste based on USDOT requirements, such as proper shipping name and hazard class. Call the USDOT information line provided above for more information on USDOT waste description requirements.

The transporter signs the completed manifest when the shipment is accepted for transport and gives you a copy of the signed manifest. The facility operator at the designated treatment, storage or disposal facility also signs the form when the shipment is received and sends a copy of it back to you. You must keep this copy on file for three years. (However, it might be a good practice to keep it for as long as you are in business.)

If you are a large quantity generator and do not receive a signed copy of the manifest from the designated treatment, storage or disposal facility within 35 days of shipment, you should contact your transporter and/or the designated facility and determine the

status of your waste. If you still have not received a copy within 45 days of shipment you must file an exception report with the Hazardous Materials and Waste Management Division explaining your efforts to determine the status of your waste shipment. Small quantity generators need only submit a copy of the manifest and a note indicating that they have not received confirmation of delivery within 60 days of shipment.

Land Disposal Restrictions (LDR) Reporting Requirements

Regardless of where your waste is being sent, each initial shipment of waste must include a land disposal restriction certification or notification form. The purpose of this form is to provide notice to subsequent handlers of your waste that your waste meets or must be treated to meet specific treatment standards before it is land disposed. There are no specifically required forms for the notice or certification, only required language. Typically your recycling, treatment, storage or disposal facility will provide forms to you.

Selecting a Treatment, Storage or Disposal Facility

It is important to choose your transporter and your recycling, treatment, storage or disposal facility carefully since you remain responsible for the proper management of your hazardous waste even after it has left your site. You may only send your waste to an authorized recycling, treatment, storage or disposal facility utilizing an EPA notified hazardous waste transporter. Most waste management facilities will have EPA identification numbers and have a permit issued to them either from the Hazardous Materials and Waste Management Division or the EPA. You should always check with the Hazardous Materials and Waste Management Division or appropriate state authority for facilities located outside of Colorado to be sure that the facility you select has been authorized to manage your type of hazardous waste.

For help in choosing a transporter or recycling, treatment, storage or disposal facility, check with the following sources:

- ✓ References from business colleagues who have used a specific hazardous waste transporter or recycling, treatment, storage or disposal facility.
- ✓ Trade associations for your industry that might keep a file on companies that handle hazardous waste.
- ✓ The Better Business Bureau or Chamber of Commerce in the recycling, treatment, storage or disposal facility's area, which might have a record of any complaints registered against a transporter or a facility

- ✓ The state hazardous waste management agency or EPA Regional office, which can tell you whether the transporter or the treatment, storage or disposal facility has an EPA identification number and/or a permit or some other form of authorization allowing them to manage your specific type of waste.



What are my reporting and record-keeping responsibilities?

Waste Determination Records

You must keep copies of any test results, waste analysis, or other information used to determine if your waste is a hazardous waste for at least 3 years.

Land Disposal Restriction (LDR) Records

You must retain on-site copies of all notices, certifications, waste analysis data and any other LDR documentation for at least 3 years from the date the waste was last sent to your waste treatment, storage or disposal facility.

Biennial Reporting

Large quantity generators must submit a biennial report (EPA form 8700-13A) to the Hazardous Materials and Waste Management Division by March 1 of each even numbered year. This report contains detailed information on your waste management activities for the previous calendar year. You are responsible for submitting a biennial report even if you were a large quantity generator for only a portion of the year. You must keep copies of your biennial report for at least 3 years from the due date of the report.

If you have notified the Hazardous Materials and Waste Management Division that you are a Large Quantity Generator you will automatically be mailed the appropriate forms. If you need forms please request them from the division by calling (303) 692-3300.

Hazardous Waste Manifests

You must keep copies of each signed manifest received back from your recycling, treatment, storage or disposal facility. This signed copy must be kept for at least 3 years from the date the waste was accepted by the initial transporter.

Hazardous Waste Fees

Small and large quantity generators of hazardous waste are required to pay two separate annual fees to the department. Each year, around October, the Hazardous Materials and

Waste Management Division will send each small and large quantity generator a single bill assessing them the following fees.

Hazardous Waste Generator Fee

(FY 2000-2002 fees are the following)

Small Quantity Generators - \$300

Large Quantity Generators - \$1900

Hazardous Waste Commission Fee

(FY 2000-2001 fees are the following)

Small Quantity Generators - \$65

Large Quantity Generators - \$210

If you have questions regarding these fees or if you have problems with your bill, please contact the Hazardous Materials and Waste Management Division at (303) 692-3300 and ask for assistance.



Who do I talk to if I need more help?

For further assistance in understanding the hazardous waste regulations applicable to you, please contact the Hazardous Materials and Waste Management Division's Technical Assistance line at (303) 692-3320. *If you're outside the 303 area code please use the Hazardous Materials and Waste Management Division's toll free number - (888) 569-1831 ext. 3320.*



Where can I find additional information?

For more information about the hazardous waste regulations that apply to chemical dry cleaners, it is suggested that you read the Hazardous Materials and Waste Management Division's *"Guide to Generator Requirements of the Colorado Hazardous Waste Regulations"*. This document can be obtained from the division or can be viewed/downloaded from the Internet at <http://www.cdphe.state.co.us/hm/handbk98.pdf>.

Hazardous Waste Generator Requirements - Summary Table

GENERATOR REQUIREMENT	GENERATOR CATEGORY		
	Conditionally Exempt Small Quantity Generator (CESQG)	Small Quantity Generator (SQG)	Large Quantity Generator (LQG)
Hazardous Waste Determination	Required through process knowledge or analysis (supporting documentation recommended)	Required through process knowledge or analysis (supporting documentation required)	Required through process knowledge or analysis (supporting documentation required)
On-site Treatment	Unrestricted (Knowledge of proper & safe treatment methods implied)	Part "B" Permit, Permit-by-Rule, Treat in WWTU or Treat to meet LDR	Part "B" Permit, Permit-by-Rule, Treat in WWTU or Treat to meet LDR
Monthly Generation Rate	<1 kg. of acutely HW (~1 qt.) <100 kg. or 220 lbs. of HW ($\leq \frac{1}{2}$ of a 55 gallon drum or ~ 25 gallons)	<1 kg. of acutely HW (~1 qt.) >100 kg. or 220 lbs. but <1000 kg. or 2200 lbs. of HW ($> \frac{1}{2}$ of a 55 gallon drum but <5/55 gallon drums)	>1 kg. of acutely HW (~1 qt.) >1000 kg. or 2200 lbs. of HW (>5/55 gallon drums)
Maximum Accumulation	<1 kg. of acutely HW (~1 qt.) <1000 kg. or 2200 lbs. of HW (~5/55 gallon drums)	<1 kg. of acutely HW (~1 qt.) <6000 kg. or 13,200 lbs. of HW (~30/55 gallon drums)	No limit
Accumulation Time Period	None	180 days or 270 days if TSDF > 200 miles away (30 day ext. available)	90 days (30 day ext. available)
EPA ID Number	Not Required (recommended)	Required	Required
Manifest	Not Required (recommended)	Required	Required
Exception Reports	Not Required (recommended)	Notify CDPHE within 60 days & include a copy of the Manifest	Contact handler within 35 days, Report to CDPHE within 45 days
Biennial Reports	Not Required	Not Required	Required (March 1 st of even years)
Contingency Plan	Not Required (recommended)	Basic Plan Required	Written Plan Required
Container Management	Not Required (recommended)	Good Condition, Compatible with Waste, Labeled as Haz. Waste, Aisle Space, Lids, Weekly Inspections & Acc. Start Date <u>unless</u> at Satellite Area	Good Condition, Compatible with Waste, Labeled as Haz. Waste, Aisle Space, Lids, Weekly Inspections & Acc. Start Date <u>unless</u> at Satellite Area
Tank Management	Not Required (recommended)	Good Condition, Compatible with Waste, Labeled as Haz. Waste, Acc. Start Date Tracked & Daily Inspections	Good Condition, Compatible with Waste, Labeled as Haz. Waste, Acc. Start Date Tracked, Daily Inspections & Secondary Containment
Personnel Training	Not Required (recommended)	Basic Training Required	Written Training Plan Required
Record Keeping	Disposal Receipts & Waste Analysis Records (recommended)	Manifests, LDR & Waste Analysis Records	Manifests, LDR, Training Records, Biennial Reports, Exception Reports & Waste Analysis Records

SECTION 3
OTHER LAWS & REGULATIONS

OCCUPATIONAL SAFETY & HEALTH
ADMINISTRATION (OSHA)
REGULATION HIGHLIGHTS

BE AWARE OF YOUR OSHA OBLIGATIONS!!!

The mission of the Occupational Safety and Health Administration (OSHA) is to save lives, prevent injuries and protect the health of America's workers.

OSHA has the following areas of concern regarding hazards in the dry cleaning industry:

® **Exposure to Hazardous Chemicals** - The best way to prevent hazardous solvents from causing harm is to minimize or prevent exposure. To achieve this, OSHA requires you to prepare a written hazardous communication program.



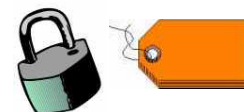
® **Uncontrolled Fires** - OSHA standards require employers to provide proper exits, fire fighting equipment, and employee training to prevent fire deaths and injuries in the workplace.

® **Ergonomic Hazards** - Workers who repeat the same motion throughout their workday may develop work-related musculoskeletal disorders. Some common dry cleaning activities that pose risks occur during garment transfer, pressing, and bagging. Ergonomic disorders can often be prevented by simple and inexpensive changes in the workplace.



® **Exposure Control for Blood Borne Pathogens** - You must protect you and your employees' health by controlling any risk you may have when handling garments that are potentially exposed to human blood and pathogens (i.e., hospital and fire department uniforms). OSHA has requirements to control your exposure.

® **Lockout/Tagout Program** - To avoid unnecessary employee accidents, OSHA requires that you follow special tag out procedures when doing servicing or maintenance on any of your equipment or machines.



Owners of dry cleaning shops should establish effective safety and health programs and prepare their workers to handle emergencies before they arise. This can be achieved through a comprehensive emergency response plan.



For **FREE** assistance on how to prevent these hazards from occurring at your shop or how to comply with any OSHA standard, please contact the Occupational Safety and Health Section at Colorado State University at (970) 491-6151.
Safety pays and it's simply good business - ask OSHA how!

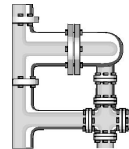
SECTION 3
OTHER LAWS & REGULATIONS

**LOCAL FIRE AND BUILDING
DEPARTMENT REQUIREMENTS**

BE AWARE OF YOUR HAZARDOUS MATERIALS STORAGE OBLIGATIONS!!!

Your local fire department and city building departments require you and your dry cleaning business to comply with certain requirements for the safe handling and storage of hazardous materials (such as perc, petroleum based solvents, or any other hazardous material). The requirements may vary from one local district to another. Some common requirements found are:

- ✓ **Tanks and containers** must meet specific design requirements as well as be properly labeled.
- ✓ **Special control requirements** for the handling and storage of flammable/combustible materials.
- ✓ **Bonding and grounding** requirements on hazardous material containers to avoid build up of static electricity, which can pose a fire hazard.
- ✓ **Testing for leaks** on all pipes and valves where hazardous materials go through.



These departments also require dry cleaners to keep their **stills** and **dryer traps** clean from any build up.

There are also general building requirements you need to comply with. Some of these requirements include:

- ✓ **Adequate building access, ventilation** (must have a fresh air supply, it can not be re-circulated), and **water supply**.
- ✓ **Sprinkler and alarm systems** and generally one **fire extinguisher** is required for every 75 feet.



To learn more about what your specific requirements are for your area, please contact your local fire and building departments.

SECTION 3
OTHER LAWS & REGULATIONS

**EMERGENCY PLANNING and
COMMUNITY RIGHT-TO-KNOW ACT
(EPCRA) REGULATIONS**

The Emergency Planning and Community Right-To-Know Act: Providing the Public Information about the Use of Hazardous Chemicals



Why should a dry cleaner be concerned about the Emergency Planning and Community Right-to-Know Act?

The Federal Emergency Planning and Community Right-to-Know Act (EPCRA), also known as the Superfund Amendment and Reauthorization Act (SARA) Title III, is designed to provide information to help emergency responders, such as fire departments, to properly handle emergency situations when potentially harmful products are on the premises. SARA Title III requires that detailed information about the nature of hazardous substances in or near communities be made available to the public. In order to accomplish this, SARA Title III contains the following four complementary provisions that potentially affect businesses using or storing hazardous chemicals:

1. Planning for chemical emergencies.
2. Emergency notification of chemical accidents and releases.
3. Reporting of hazardous chemical inventories.
4. Toxic chemical release reporting.

The purpose of these provisions is to alert the community as to the exact hazardous chemicals that are used or stored at a business. All businesses using or storing SARA Title III hazardous chemicals at amounts equal to or greater than specific threshold planning quantities (TPQ) or reportable quantities (RQ) must report the chemicals to the appropriate federal, state, or local authorities (some requirements use TPQ for determining reporting while others use RQ). The EPA compiles a consolidated list of all the SARA Title III chemicals and their respective TPQs and/or RQs.

Colorado follows the SARA Title III regulations to the letter. Thus, the state's reportable chemicals and reporting thresholds are identical to the EPA's. However, local authorities (e.g. fire departments) have the right to list additional

chemicals and set lower TPQs and RQs for any chemical being used in their district. In some cases they may even have a zero threshold. Please contact your Local Emergency Planning Committee (LEPC) contact or your local fire department to determine what your notification and reporting requirements are for your area (see Appendix C for a complete list of Colorado's LEPCs).



How do I know what EPCRA requirements apply to me?

The one SARA Title III provision that dry cleaners must pay attention to is the emergency notification of chemical accidents and releases. This provision uses RQ for a reporting trigger. Under these requirements, perc is a listed SARA hazardous chemical with a RQ of 100 pounds (approximately 7 gallons). If you accidentally spill 100 pounds or more of perc, you must report it to the appropriate authorities.

Typically, the other three SARA Title provisions referenced above will not apply to Colorado's dry cleaners because the reporting thresholds for perc are set high enough (i.e., 10,000 pounds or approximately 735 gallons) that the majority of dry cleaners are not affected. If you are a large dry cleaner that ever has 735 gallons or more of perc at your facility, please see the section below on who to call for additional help.

BE CAREFUL - under the "reporting of hazardous chemical inventories" provisions, local authorities have the right to set lower reporting thresholds for any chemical being used in their district (whether it is a listed SARA Title III chemical or not). For example, Arapahoe County requires all businesses to report **ALL** chemicals used or stored, regardless of the amount, to the local Fire Department and the LEPC. As mentioned above, please check with your LEPC contact or local fire department to determine what your notification and reporting requirements are for your area (see Appendix C for a complete list of Colorado's LEPCs).



Do I need a permit under EPCRA?

No permit is required from any federal, state, or local authority.

What are my general Emergency Notification requirements?



PERC is, most likely, the only listed substance under the emergency notification requirements that a dry cleaner will need to be concerned with regarding spill reporting. However, an owner should practice good judgement anytime a chemical substance is spilled. If the substance can potentially cause harm to workers or the environment, it should be reported. The substance should properly be cleaned up; if it is hazardous, it should not be disposed of down the drain.



What are my specific Emergency Notification reporting requirements?

General Accidental Releases

If you accidentally spill perc in the amount equal to or greater than 100 pounds (or approximately 7 gallons) you must report it by telephone to the following agencies:

1. The **National Response Center** (NRC) at **1-800-424-8802** (24-hr);
2. The **Colorado Emergency Planning Commission**, which is represented by the Colorado Department of Public Health and Environment (CDPHE) at **1-877-518-5608**;
3. The **Local Emergency Planning Committee (LEPC)** (see Appendix C for your LEPC contact and phone number).

A written follow up report describing the spill must be sent to both the CDPHE and the LEPC (see Appendix C for your local LEPC address). The address for the CDPHE is:

Colorado Department of Public Health and Environment
Emergency Management Program
4300 Cherry Creek Drive South, Denver, Colorado 80246

Accidental Releases to Water

If you release any amount of perc, or any amount of any other chemical (even if it is not a listed SARA Title III hazardous chemical), which may enter waters of the State, which include surface water, ground water and dry gullies or storm sewers leaking to surface water, then you must immediately report it to the **CDPHE at 1-877-518-5608**. Any accidental discharge to the sanitary sewer system must be reported immediately to the local sewer authority and the affected wastewater treatment plant (see Appendix A for a list of local wastewater treatment plants).

Accidental Releases to Air

Any unpredictable failure of air pollution control or process equipment which results in the violation of emission control regulations or permit conditions (i.e., exceed the permit emission limitations) should be reported to the **Air Pollution Control Division at 303-692-3155** by 10:00 a.m. of the following working day.



Who do I talk to if I need more help?

Colorado Department of Public Health and Environment

- For general information on spill reporting requirements (not actually reporting a spill), call 303-692-3020 Monday – Friday from 8:00 a.m. to 5:00 p.m. MST.
- For information on other EPCRA/SARA Title III requirements, call the CDPHE EPCRA staff person at 303-692-2977 Monday – Friday from 8:00 a.m. to 5:00 p.m. MST or visit the Department's EPCRA/SARA Title III home page at the following internet location:

<http://www.cdphe.state.co.us/ic/ecac/SARA/SARAProgram.asp>

Environmental Protection Agency

- EPCRA/SARA Title III Hotline at 1-800-424-9346; Monday – Friday from 9:00 a.m. to 6:00 p.m. EST
- EPA Small Business Ombudsman at 1-800-368-5888; Monday – Friday from 8:00 a.m. to 5:00 p.m. EST



Where can I find additional information?

Colorado Department of Public Health and Environment

Emergency Management Program Home Page

<http://www.cdphe.state.co.us/emp/emphom.asp>

EPCRA/SARA Title III Program Home Page

<http://www.cdphe.state.co.us/ic/ecac/SARA/SARAProgram.asp>

Environmental Protection Agency

Chemical Emergency Preparedness and Prevention Office (CEPPO) –
Preparedness/Emergency Planning and Community Right-to-Know Home Page

<http://www.epa.gov/swercepp/crtk.html>

CEPPO Emergency Response Home Page

<http://www.epa.gov/swercepp/emerg.html>

SECTION 4

POLLUTION PREVENTION



Pollution Prevention



Why should a dry cleaner consider pollution prevention practices?

Because improper or careless work practices in the process of dry cleaning can cause pollution and attendant liabilities in your business and pollution prevention can save you money in running your business. Pollution prevention is the practice of preventing or reducing pollution at the source through using less hazardous materials or using more efficient practices or processes. The benefits of pollution prevention include:

- r Lower costs for solvent materials, such as perc.
- r Lower costs for waste disposal.
- r Reduce your regulatory burden.
- r Reduce risks to your employees' health and safety.
- r Improved business image.
- r Reduce risk of a soil or groundwater clean up.



How do I know what pollution prevention practices apply to me?

There are several areas in the overall process of dry cleaning where pollution prevention can be practiced. Some common areas include:

PROCESS MODIFICATIONS

- U Recover all solvent possible from spent filter cartridges.
- U Minimize the time machine doors and button traps are open.
- U Load machines with the optimal amount of clothing for the machine capacity.
- U Use optimal drying times and temperatures and optimal condenser temperatures.
- U If cartridge filters are used, add a pre-wash step whenever possible.
- U Use pumps and hoses to dispense new materials and funnels to transfer wastes to storage containers.
- U Utilize properly designed cleaning processes and recommended amounts of additives (i.e., detergents, sizing, etc.) to ensure good cleaning performance and also minimize re-cleans.

EQUIPMENT

- r If cartridge filters are used, use a pre-lint filter.
- r Install or retrofit a solvent recovery system such as carbon adsorption, refrigerated condenser, or a distillation system.
- r Use a wheel sensor to check the dryness of clothes.
- r Use an evaporator for separator water.
- r Place a spill containment tray around equipment.
- r Consider installing additional carbon adsorption or refrigeration units to recover valuable solvent.
- r Consider using higher efficiency dry-to-dry machines with features including no vents, emission-free rake out system, and emission and spill-free filling system.
- r Replace transfer machines with refrigerated equipment offering better environmental performance such as refrigerated dry-to-dry, wet cleaning, or hydrocarbon solvent machines.

SPILL AND LEAK PREVENTION

Note: The EPA requires these procedures for perc users (as previously referenced in the “Air Emissions” Section) but they are good for every dry cleaner to use. These procedures will result in machines lasting longer and having fewer problems, which means lower operating costs.

- U Check hoses, couplings, pumps, valves and gaskets on a regular schedule.
- U Take special care when handling your cleaning materials to prevent spills.
- U Know how much solvent your machine normally uses and track usage.
- U Keep all containers covered to prevent evaporation and spillage.
- U Provide secondary containment in areas where solvents are stored.

MATERIAL SUBSTITUTION AND MANAGEMENT

- r Utilize water-based pre-spotters instead of those containing solvents.
- r Look for damaged containers and leaks when materials are delivered.
- r Do not stock up solvents; buy only what you need.
- r Accept delivery of your solvent in small drums, with a direct coupled, closed loop, vapor recovery system to transfer the solvent into your machine.

GOOD OPERATING PRACTICES

- U** Follow a strict maintenance schedule. Maintenance is cheaper than repairs.
- U** Clean your lint screens regularly.
- U** Keep storage areas clean and well organized.
- U** Stay current on practices and technology in your industry.
- U** Use alternative fueled trucks.

RECYCLING PRACTICES

- r** Recycle hangers, poly (plastic bags), and safety pins
- r** Recycle perc
- r** Dispose of still bottom residue to recyclers that convert it into alternative fuels.
- r** Reuse water from water-cooling towers.

ENERGY SAVING TIPS

- U** Install energy-efficient equipment such as fluorescent and compact lamps, task lighting, reflectors, and lighting controls.
- U** Isolate unused space in your building by closing heating and cooling vents and covering exterior windows.
- U** Caulk any leaks in your building exterior, i.e., walls, windows, doors, ceilings, and floors.
- U** Install programmable thermostats for heating, ventilating, and air conditioning (HVAC).
- U** Practice good furnace maintenance and cleaning such as replacing dirty air filters. Also, perform simple maintenance practices such as cleaning intake screens, condenser coils, supply registers, and return grills.
- U** Consider using a natural gas boiler for heating.
- U** Install flow restrictors and self-closing faucets for your hot water supply.
- U** Use an insulating jacket for your water heater. A simple electronic time-of-use controller will ensure that your electric water heater is off when not needed.
- U** Turn off office equipment (computers, printers, and copiers) when not needed.
- U** Buy energy efficient equipment and appliances whenever possible.
- U** Switch to an alternative fuel in your business vehicles, such as in your delivery vehicles.



Who do I talk to if I want to know more about pollution prevention?

Colorado Pollution Prevention Program:

(303) 692-2977, (303) 692-2975 or (303) 692-3255



Who do I talk to if I want to know more about energy conservation?

Environmental Protection Agency:

Energy Star Small Business Program at 1-888-782-7937

Green Lights Program at (202) 775-6650

U.S. Department of Energy (DOE):

Energy Efficiency & Renewable Energy Clearinghouse at 1-800-363-3732

Other:

National Alternative Fuels Hotline at 1-800-423-1363



Where can I find additional information?

Pollution Prevention:

EPA Design for the Environment (DfE) Garment and Textile Care Program Website

<http://www.epa.gov/dfe/garment/garment.html>

Colorado Pollution Prevention Case Studies

<http://www.coloradop2.org/csdry.htm>

Pollution Prevention: *continued*

A Pollution Prevention Guide for the Dry Cleaning Industry – by the Delaware Department of Natural Resources and Environmental Control

<http://www.dnrec.state.de.us/deldrycl.htm>

The Green Clean Project: A Voluntary Pollution Prevention Initiative for the Dry Cleaning Industry (The Final Report)

<http://www.cciw.ca/glimr/data/final-green-clean/>

Wetcleaning Equipment Report: A report on washers, dryers, finishing equipment, and detergents for machine-based professional wetcleaning

<http://www.cnt.org/index.cfm?FuseAction=Project&ProjectID=2>

National Clothesline Website: Provides news and information needed by garment care professionals to be successful in a rapidly changing industry.

<http://www.natclo.com/>

EPA's Vendor Information (Vendor Info): A repository of more than 400 listings of pollution prevention equipment, products, or services.

<http://es.epa.gov/vendors/>

Small Business Waste Reduction Guide - Currently includes 3 case studies from the garment cleaning industry.

<http://es.epa.gov/new/business/sbdc/sbdc7.htm>

Energy Conservation:

EPA Energy Star Business Program

<http://www.energystar.gov/>

DOE Energy Efficiency and Renewable Energy Network (EREN)

<http://www.eren.doe.gov>

SECTION 5

DRY CLEANER SCENARIO

EXAMPLE OF STEPPING THROUGH THIS GUIDE
TO COMPLY WITH THE COLORADO
ENVIRONMENTAL REGULATIONS

DRY CLEANER SCENARIO



Example of Stepping through this Guide to Comply with the Colorado Environmental Regulations

Case Example (illustration only):

Mr. Suds Smith owns and operates Acme Cleaners located in Aurora, Colorado. Mr. Smith opened his shop in July 2001 and has one Multimatic Shopstar™ dry-to-dry machine. Mr. Smith uses approximately 60 gallons of perc per year.

Mr. Smith's one Multimatic Shopstar™ has a refrigeration recovery unit and a distillation unit. He utilizes cartridge filters and spin disk filtration.

Acme Cleaners' waste generation rate is 300 pounds per month.

Acme Cleaners is located at:

143 Gateway Boulevard
Aurora, CO 80001
(303) 987-1234

Complying with State & Federal Air Regulations



Regulation Applicability

Yes/No

Federal Perc Rule

Yes

This rule applies, since Mr. Smith uses perc.

Colorado State Permit/APEN rule

Yes

Mr. Smith requires a permit because he is subject to the Federal Perc Rule.

Mr. Smith must submit an APEN form (along with the \$100 filing fee) in order to obtain his permit from the division. The federal perc rule requirements will be outlined in his permit. A copy of Mr. Smith's completed APEN is provided at the end of this section.

Mr. Smith is complying with the federal perc rule control requirements since he has a refrigerated condenser on his Multimatic Shopstar™. If his machine did not already have a refrigerated condenser, he would have had to install one or purchase a machine that already has one to comply with the federal perc rule.

Mr. Smith must also follow the reporting and record-keeping requirements covered in the federal perc rule. To comply with his reporting requirements, he must submit the following 2 reports:

- Perchloroethylene (Perc) Dry Cleaner Initial Notification Report.
- Perchloroethylene (Perc) Dry Cleaner Compliance Report for Control Equipment.

To comply with his record-keeping requirements, Mr. Smith must maintain records of his monthly perc consumption (for the previous 12-month period at all times) and a record of leak inspections of his dry cleaning equipment. Mr. Smith must also keep a record of the temperature of his refrigerated condenser to comply with his monitoring requirements. Copies of all of Mr. Smith's reports and records are provided at the end of this section.

Complying with State & Local Water Regulations



Since Mr. Smith is located in Denver, his shop is subject to a zero discharge limitation and is required to obtain a zero discharge permit from his governing wastewater treatment plant, Metro Wastewater Reclamation District.

Metro Wastewater does not have an application form for obtaining a zero discharge permit. Mr. Smith just needed to directly notify them that he is a dry cleaner operating within their district. After Mr. Smith notified Metro Wastewater, an inspector went out to his shop to check that he is following all the requirements to meet the zero discharge limitation. Subsequently, Metro Wastewater issued Acme Cleaners a Zero Discharge Permit. An example of a blank "Metro Wastewater Reclamation District Zero Discharge Permit" is included at the end of this section.

REMEMBER: Your wastewater requirements will depend on where you are located and where your wastewater goes (i.e., storm sewer, septic system, or into a sewer system that is routed to a wastewater treatment plant). The best way to find out what your requirements are is to call the department's Water Quality Control Division at (303) 692-3500.

Complying with State & Federal Waste Regulations



Acme Cleaners waste generation rate of 300 pounds per month categorizes Mr. Smith as a small quantity generator (SQG). As a result, Mr. Smith must obtain an EPA Identification Number by completing and submitting EPA Form 8700-12 to the Hazardous Materials & Waste Management Division. Mr. Smith's completed EPA Form 8700-12 (example) immediately follows this section.

Mr. Smith must follow the hazardous waste management requirements for a SQG. The summary table for hazardous waste generator requirements at the end of the waste section (found in Section 2) provides a quick recap of what the requirements are for a SQG.

Mr. Smith's requirement for shipping his waste off site entails completing and maintaining a hazardous waste manifest form. A manifest must accompany each shipment of Mr. Smith's hazardous waste that is transported from his shop. A copy of one of Mr. Smith's completed manifest forms is included at the end of this section.

SECTION 5.1

DRY CLEANER SCENARIO

EXAMPLE DOCUMENTS

Acme Cleaners APEN.....	60.1
Acme Cleaners Initial Notification Report.....	60.2
Acme Cleaners Compliance Report for Control Equipment.....	60.3
Acme Cleaners Consumption Records.....	60.4
Acme Cleaners Leak Inspection Records.....	60.5
Acme Cleaners Condenser Temperature Records.....	60.6
Example Zero Discharge Permit.....	60.7
Acme Cleaners EPA Form 8700-12.....	60.8
Acme Cleaners Hazardous Waste Manifest.....	60.9

- DRY CLEANERS -**Air Pollutant Emission Notice (APEN) – and – Application for Construction Permit**

☒ New Facility ☐ Transfer of Ownership * † ☐ Change in Material Use † ☐ No Change, APEN Update Only † ☐ Change in Equipment †

† This APEN option does not require that all of the technical information of this APEN be completed, only the information that has changed or needs updating should be filled in.

* **Note:** If you are transferring the ownership of a permit, you must also submit an Administrative Permit Amendment form and Transfer of Emission Permit Agreement form.

Permit Number _____

AIRS Number _____

Company Name: ACME CLEANERSPlant Location: 143 GATEWAY BOULEVARD, AURORACounty: ARAPAHOEBilling Address: 143 GATEWAY BOULEVARD, AURORAZip Code: 80001-9876Person to Contact: SUDS SMITHPhone Number: 303.987.1234E-Mail Address: suds.smith@acmecleaners.comFax Number: 303.987.4321

Is this facility owned or managed by another company or corporation?

NO

If YES, provide name of company and mailing address:

SECTION 1

EQUIPMENT INFORMATION

Dry-to-Dry Units:

List Make, Model, Serial Number, and Date of Installation

	<u>Make</u>	<u>Model</u>	<u>Serial</u>	<u>Date of Installation</u>
Machine #1	<u>MULTIMATIC</u>	<u>SHOPSTAR</u>	<u>123456-123</u>	<u>07/25/2001</u>
Machine #2	_____	_____	_____	_____
Machine #3	_____	_____	_____	_____

Do any of these units vent directly to the outside? NO If so which ones? _____

Transfer Type Washers:

List Make, Model, Serial Number, and Date of Installation

	<u>Make</u>	<u>Model</u>	<u>Serial</u>	<u>Date of Installation</u>
Machine #1	_____	_____	_____	_____
Machine #2	_____	_____	_____	_____
Machine #3	_____	_____	_____	_____

Do any of these units vent directly to the outside? _____ If so which ones? _____

Colorado Department of Public Health and Environment
Air Pollution Control Division

- DRY CLEANERS -

Dryers (not part of dry-to-dry unit):

List Make, Model, Serial Number, and Date of Installation

	<u>Make</u>	<u>Model</u>	<u>Serial No</u>	<u>Date of Installation</u>
Machine #1	_____	_____	_____	_____
Machine #2	_____	_____	_____	_____
Machine #3	_____	_____	_____	_____

Do any of these units vent directly to the outside? _____ If so which ones? _____

SECTION 2

SOLVENT INFORMATION

Type and Quantity

Check one:

☒ PERC ☐ Petroleum ☐ Fluorocarbon ☐ Other (explain): _____

Maximum amount of solvent purchased each year? 60 Gallons

Requested permit limit for solvent? 139 Gallons

Solvent Recovery

Check which methods are used:

☐ Sniffer (Carbon Absorber) Which Machines? _____

Age of Sniffer: _____ years.

Is the entire dryer exhaust vented through the sniffer? _____

☒ Cartridge Filters

Do you cook / strip the filters? NO

How many filters are disposed of yearly? 12

☒ Refrigeration Recovery Which Machines? MULTIMATIC

☒ Spin Disk Filtration Which Machines? MULTIMATIC

☒ Distillation Which Machines? MULTIMATIC

☐ Carbon Tower Which Machines? _____

☐ Other (Please explain): _____

SECTION 3

FOR INDUSTRIAL (WHOLESALE) DRY CLEANERS ONLY

Do you operate any steam or water boilers at this facility ? NO

If yes, a general APEN with the information of the Fuel Consumption and Hourly Design Rate must accompany this form.

Colorado Department of Public Health and Environment
Air Pollution Control Division

- DRY CLEANERS -

Additional Comments:

SUDS SMITH

07/25/2001

Signature of a Responsible Official (not a vendor or consultant)

Date

SUDS SMITH

OWNER

Name (please print)

Title

Check the appropriate box if you want:

☒ Copy of Preliminary Analysis conducted by the Division

☒ To review a draft of the permit prior to issuance

(Checking any of these boxes may result in an increased fee and/or processing time)

This notice is valid for five (5) years unless a significant change is made, such as an increased production, new equipment, change in fuel type, etc. A revised APEN shall be filed no less than 30 days prior to the expiration date of this APEN form.

Send this form along with \$119.96 to:
Telephone: (303) 692-3150

**Colorado Department of Public Health and Environment
Air Pollution Control Division
APCD-SS-B1
4300 Cherry Creek Drive South
Denver, CO 80246-1530**

For more information or assistance call:

Small Business Assistance Program

(303) 692-3175

(303) 692-3148

Small Business Ombudsman

(303) 692-2034

**Perchloroethylene (Perc) Dry Cleaner
Initial Notification Report**

1. Print or type the following for each separately located dry cleaning plant (facility). The owner of more than one plant must fill out a separate form for each plant.

Owner or Operator: Suds Smith

Company Name: Acme Cleaners

Mailing Address: 143 Gateway Boulevard

City: Aurora State: Colorado Zip: 80001-9876

Plant Address (If different than mailing address.)

Street Address _____

City _____ State _____

Phone Number: (303) 987-1234

2. Check the box below if:

9 Your dry cleaner is a pick-up store.

9 Your dry cleaning plant has only coin-operated dry cleaning machines that are operated by the customers.

If you checked either box above, you can STOP HERE and return the form to the address given in the accompanying letter.

3. Write in the total volume of perchloroethylene (perc) purchased for ALL of the machines at the dry cleaning plant over the past 12 months:

60 gallons

NOTE: If the perchloroethylene purchase records have not been kept at the plant, the volume may be estimated for this initial report.

Method of determining gallons (circle one)

Actual

Estimated

4. Next to each machine type listed below. Write the number of machines of that type located at your plant:

1 Dry-to-Dry _____ Transfer

5. Provide the following information for **EACH MACHINE** at your plant. If you have more than 4 machines at your plant, make additional copies of this page.

	Machine 1	Machine 2	Machine 3	Machine 4
Machine Type (circle one)	Dry-to-Dry or Transfer	Dry-to-Dry or Transfer	Dry-to-Dry or Transfer	Dry-to-Dry or Transfer
Date Machine Was Installed	7/25/2001			
Control Device	Refrigerated Condenser			
Date Control was Installed	7/25/2001			

6. The following pollution prevention practices **MUST** be performed at your plant starting on 12/20/93. These practices are listed on an attached sheet that can be posted next to your machine:

- C Conduct a weekly leak detection and repair program to inspect all dry cleaning equipment for leaks that are obvious from sight, smell or touch. **NOTE:** This program is required every other week if you wrote **NO CONTROL REQUIRED** in question No. 5.
- C Repair leaks within 24 hours after they are found, or order repair parts within 2 working days after detecting a leak that needs repair parts. Install the repair parts within 5 working days after they are received.
- C Keep a log of the weekly (or biweekly) results of the leak detection and repair program.
- C Follow good housekeeping practices, which include keeping all perc and wastes containing perc in covered containers with no leaks, draining cartridge filters in coded containers, and keeping machine doors shut when clothing is not being transferred.
- C Operate and maintain all dry cleaning equipment according to manufactures= instructions.

7. The following records must be kept at your plant:

- ☐ A log of the results of the leak detection and repair program.
- ☐ A log of the amount of perc purchased for the past 12 months, calculated each month.
- ☐ The operation and maintenance manuals for all dry cleaning equipment at the plant.

8. If a room enclosure is installed on a transfer machine as stated in Question 4, the following information about the room enclosure must be attached to this report.

- ☐ Description of the materials that the room enclosure is constructed of to show that it is impermeable to perchloroethylene, and
- ☐ Explanation of how the room enclosure is operated to maintain a negative pressure at all times while the transfer machine is operating, and
- ☐ Explanation of how the room enclosure exhausts into a carbon adsorber.

9. Print or type the name and title of the Responsible Official for the dry cleaning plant:

<u>Suds Smith</u>	<u>OWNER</u>
Name	Title

A Responsible Official can be:

- ☐ The president, vice president, secretary, or treasurer of the company that owns the dry cleaning plant,
- ☐ An owner or the dry cleaning plant,
- ☐ The manager of the dry cleaning plant,
- ☐ A government official if the dry cleaning plan is owned by the Federal, State, City, or County government, or
- ☐ A ranking military officer if the dry cleaning plant is located at a military base.

The Responsible Official must certify below that all of the information presented in this initial report is accurate and true.

I certify that the information contained in this report to be accurate and true to the best of my knowledge.

Suds Smith

(Signature of Responsible Official)

**Perchloroethylene (Perc) Dry Cleaner
Compliance Report for Control Equipment**

1. Print or type the following for each separately located dry cleaning plant (facility). The owner of more than one plant must fill out a separate form for each plant.

Owner or Operator: Suds Smith

Company Name: Acme Cleaners

Mailing Address: 143 Gateway Boulevard

City: Aurora State: Colorado Zip: 80001-9876

Plant Address (If different than mailing address.)

Street Address _____

City _____ State _____

Phone Number: (303) 987-1234

2. Write in the total volume of perchloroethylene (perc) purchased for the dry cleaning plant over the last 12 months (based on actual purchase receipts).

60 gallons

3. Fill out the table below for each machine at your plant. If you are not sure how to fill out this table, please consult the **WORKSHEET** on page 5.

	Machine Type (circle one)	Date Machine Installed	Required Control	Date Control Installed
1	Dry-to-Dry Transfer	7/25/2001	Refrigerated Condenser	7/25/2001
2	Dry-to-Dry Transfer			
3	Dry-to-Dry Transfer			
4	Dry-to-Dry Transfer			
5	Dry-to-Dry Transfer			
6	Dry-to-Dry Transfer			

4. If you listed a required control in Question 3 for any machine at your plant, you must monitor your control.

U I use a refrigerated condenser on a dry-to-dry machine to meet the required control.

If you checked this box, you are required to perform a weekly monitoring test to show that the temperature on the outlet side of the refrigerated condenser is less than or equal to 45 degrees Fahrenheit.

9 I use a refrigerated condenser on a transfer machine to meet the required control.

If you checked this box, you are required to perform a weekly monitoring test to show that the temperature on the outlet side of the refrigerated condenser on the transfer dryer is less than or equal to 45 degrees Fahrenheit AND that the difference between the inlet and outlet temperature of the refrigerated condenser on the transfer washer is greater than or equal to 20 degrees Fahrenheit.

9 I use a carbon adsorber on a dry to dry or transfer machine to meet the required control, OR

9 I use a supplemental carbon adsorber on a dry to dry machine and the exhaust passes through a carbon adsorber immediately upon door opening to meet the required control.

If you checked either of the two boxes above, you are required to perform a weekly monitoring test with a colorimetric detector tube to show that the concentration of perc in the exhaust from the carbon adsorber is not over 100 parts per million.

9 I use a supplemental carbon adsorber on a dry to dry machine and the exhaust passes through a carbon adsorber BEFORE the machine door is opened.

If you checked this box, you are required to perform a weekly monitoring test with a colorimetric detector tube to show that the concentration of perc inside the dry cleaning machine drum at the end of the drying cycle is not over 300 parts per million.

9 I use a room enclosure on a transfer machine.

If you checked this box, you are required to vent all air from inside the room enclosure through a carbon adsorber. The room enclosure must be constructed of materials impermeable to perc, must be designed and operated to maintain a negative pressure at all times while the transfer machine is operating, and must exhaust to a carbon adsorber.

5. Print or type the name and title of the Responsible Official for the dry cleaning facility:

<u>Suds Smith</u>	<u>OWNER</u>
Name	Title

A Responsible Official can be:

- ☐ The president, vice president, secretary, or treasurer of the company that owns the dry cleaning plant,
- ☐ an owner or the dry cleaning plant,
- ☐ the manager of the dry cleaning plant,
- ☐ a government official if the dry cleaning plan is owned by the Federal, State, City, or County government, or
- ☐ A ranking military officer if the dry cleaning plant is located at a military base.

The Responsible Official must certify below that all of the information presented in this initial report is accurate and true.

I certify that the information contained in this report to be accurate and true to the best of my knowledge and that this plant is in compliance with all applicable control device and monitoring requirements listed in this report.

Suds Smith

(Signature of Responsible Official)

WORKSHEET

A. To find out if a control is required:

Check all boxes that apply:

U I reported less than 140 gallons in Question 2 (page 2).

G I reported less than 200 gallons in Question 2 (page 2) AND reported ONLY transfer machines in Question 3 (page 2).

If you checked either box above and all of your machines were installed before 12/9/1991, you can STOP HERE. Write NO CONTROL REQUIRED in the shaded box on page 2 for each machine at your plant that was installed before 12/9/1991. For those machines installed on or after 12/9/1991, continue with the worksheet.

If you did not check a box above, go to Part B below.

If you checked a box above, YOU ARE FINISHED WITH THE WORKSHEET. GO TO QUESTION 4.

B. CONTROL IS REQUIRED. Fill out Part B for EACH MACHINE at your plant.

Check the appropriate box:

G Machine was installed BEFORE 12/9/1991.

If you checked this box, your required control is a refrigerated condenser or a carbon adsorber that was installed before 9/22/1993. Write REFRIGERATED CONDENSER or CARBON ADSORBER in the REQUIRED CONTROL box for the appropriate machine on page 2.

The control must be installed by 9/22/1996.

U Machine was installed ON OR AFTER 9/22/1993.

If you checked this box, your required control is a dry-to-dry machine with a refrigerated condenser. CIRCLE Dry-to-Dry in the correct box under MACHINE TYPE on page 2. Write REFRIGERATED CONDENSER in the correct REQUIRED CONTROL box on page 2.

Control MUST be installed when machine is installed.

NOTE: NO NEW OR USED TRANSFER MACHINES CAN BE INSTALLED AFTER 9/22/1993.

G Machine was installed ON OR AFTER 12/9/1991 AND BEFORE 9/22/1993.

If you checked this box, your required control is a dry-to-dry machine with a refrigerated condenser. Circle DRY-TO-DRY MACHINE, and write REFRIGERATED CONDENSER in the correct REQUIRED CONTROL box.

If the machine you have is NOT a dry-to-dry machine with a refrigerated condenser, the machine must use either a refrigerated condenser or carbon adsorber from 9/22/1993 until 9/22/1996. On or after 9/22/1996, any carbon adsorber on a dry-to-dry machine must be replaced with a refrigerated condenser.

C. To find out if additional control is required:
Check all Boxes that apply:

U I reported 1,800 gallons or less in Question 2 (page 2).

U I reported 2,100 gallons or less in Question 2 (page 2) AND I reported only dry-to-dry machines in Question 3 (page 2).

If you checked either box above, you can STOP HERE. No additional controls are required. YOU ARE FINISHED WITH THE WORKSHEET. Return to Question 3 and write in the dates the controls were, or will be, installed.

If you did not check a box above, go to Part D below.

D. If additional control is required, fill out Part D for EACH machine at your plant.

Check a box below, if it applies:

G Machine is a dry-to-dry machine that was installed ON or AFTER 12/9/1991.

If you checked this box, you are also required to install a supplemental carbon adsorber. Write SUPPLEMENTAL CARBON ADSORBER in the correct REQUIRED CONTROL box on page 2.

G Machine is a transfer machine.

If you checked this box, you are also required to install a room enclosure. Write ROOM ENCLOSURE in the correct REQUIRED CONTROL box on page 2.

Send the form to:

**Small Business Assistance Program (SBAP)
Colorado Department of Public Health and Environment
4300 Cherry Creek Drive, South
APCD/SS/B-1
Denver, CO 80246-1530**

PERC CONSUMPTION RECORDS

MONTH	QUANTITY PURCHASED (Gallons)	12 MONTH TOTAL FROM __ Through__	12 MONTH TOTAL (Gallons)	NOTES
June 2001	20		-	
July	0		-	
August	0		-	
September	0		-	
October	20		-	
November	0		-	
December	0		-	
January 2002	0		-	
February	10		-	
March	0		-	
April	0		-	
May	0		-	
June	10		60	
July	0		40	
August	10		50	
September	0		50	

LEAK DETECTION INSPECTION LOG

Machine No.: **Multimatic Shopstar/SN-123456-123**

Year: **2001**

	Date of Inspection*	7/2/01	7/16/01	7/30/01	8/13/01				
	How inspected?** (Part number/how inspected)	Sight #8/feel	Sight #8/feel	Sight #8/feel	Sight #8/feel				
	Inspectors initials	SS	SS	SS	SS				
Part Nmbr:	Part Description:	Leaking? (Y or N)	Leaking? (Y or N)	Leaking? (Y or N)	Leaking? (Y or N)	Leaking? (Y or N)	Leaking? (Y or N)	Leaking? (Y or N)	Leaking? (Y or N)
1	Hose and pipe connections, fittings, couplings, valves	Y	N	N	N				
2	Door gasket and seating	N	N	N	N				
3	Pump	N	Y	Y	N				
4	Solvent tank and containers	N	N	N	N				
5	Water separator	N	N	N	N				
6	Muck cooker	N	N	N	N				
7	Still	N	N	N	N				
8	Exhaust damper	N	N	N	N				
9	Diverter valve	N	Y	N	N				
10	Filter gasket and seating	N	N	N	N				
11	Cartridge filter housings	N	N	N	N				
	Part number/Date ordered		#3-7/17 #9-7/18						
	Part number/Date received			#9-7/23	#3-7/29				
	Part number/Date repaired	#1 - 7/2		#9-7/23	#3-7/31				

*Date of Inspection: Less than 140 gallons perc./year, inspect every two weeks. Otherwise, inspect weekly.
 **How Inspected?: Are the machine parts inspected by sight, smell, feel, or monitoring equipment (me)?

REFRIGERATED CONDENSER WEEKLY TEMPERATURE LOG

DATE	Inspector Initials	Machine Number	Temperature	Is temp less than 45°F?
7/2/2001	SS	Multimatic Shopstar SN-123456-123	43	YES / NO
7/9	SS	Multimatic Shopstar SN-123456-123	44	YES / NO
7/16	SS	Multimatic Shopstar SN-123456-123	44	YES / NO
7/23	SS	Multimatic Shopstar SN-123456-123	43	YES / NO
7/30	SS	Multimatic Shopstar SN-123456-123	43	YES / NO
8/6/2001	SS	Multimatic Shopstar SN-123456-123	42	YES / NO
8/13	SS	Multimatic Shopstar SN-123456-123	44	YES / NO
8/20	SS	Multimatic Shopstar SN-123456-123	41	YES / NO
8/27	SS	Multimatic Shopstar SN-123456-123	43	YES / NO
9/3/2001	SS	Multimatic Shopstar SN-123456-123	44	YES / NO
9/10	SS	Multimatic Shopstar SN-123456-123	42	YES / NO
9/17	SS	Multimatic Shopstar SN-123456-123	41	YES / NO
9/24	SS	Multimatic Shopstar SN-123456-123	43	YES / NO
				YES / NO
				YES / NO
				YES / NO
				YES / NO
				YES / NO
				YES / NO
				YES / NO
				YES / NO

Metro Wastewater Reclamation District

6450 York Street

Denver, Colorado 80229-7499

Phone: (303) 286-3000 / Telefax: (303) 286-3030

***** EXAMPLE PERMIT *****

ZERO DISCHARGE PERMIT NO. M0980-0-7777

(THIS PERMIT MUST BE POSTED IN A PROMINENT LOCATION!)

This permit is issued to: **Acme Cleaners**
or any other dry cleaning facility doing business at the following address:
1234 ABCD Street
Denver, Colorado 80202

PROHIBITION: Pursuant to the provisions of the Revised Municipal Code of the City and County of Denver and the *Rules and Regulations* of the City and the Metro Wastewater Reclamation District, this facility is prohibited from discharging dry cleaning process wastes, including new and used tetrachloroethene (perchloroethylene), still bottom oil, separator water, or any other wastewaters containing perchloroethylene to the sanitary sewer system.

COMPLIANCE CONDITIONS: All dry cleaning processes, including separator water discharge lines, must be disconnected from the sanitary sewer system.

All floor drains must be permanently sealed, or berms (physical barriers) installed to separate dry cleaning machines and solvents from the floor drains.

All solvents, including waste solvents, must be safely stored and properly labeled. All wastes must be placed in appropriate containers for collection and proper disposal.

A Discharge Prohibition Sign (see attached) must be posted in the work area advising employees of the Prohibition of Discharge and whom to call in the event of an accidental discharge.

REPORTING AND RECORDS REQUIREMENTS: A Zero Discharge Compliance Report must be completed, signed, and submitted to the Metro District, no later than January 31 of each year by the facility owner, corporate officer, or manager.

The City and County of Denver (303-446-3400) and the Metro District (303-286-3000) must be notified immediately by telephone in the event of an accidental or unusual discharge of perchloroethylene. An accidental discharge report must also be submitted within five (5) working days after the accident.

Receipts of all perchloroethylene purchases and all waste disposal manifests or receipts must be maintained on-site for no less than three (3) years.

RIGHT OF ENTRY: The municipality and the Metro District may conduct random, unannounced inspections and examine and copy any records required to be maintained by this facility to determine compliance with the conditions of this permit and Pretreatment Standards and Requirements.

ENFORCEMENT AND PENALTIES: Noncompliance with the conditions of this permit will subject the permittee to penalties and other remedies available and including those provided in the City's Revised Municipal Code, the City's and the Metro District's *Rules and Regulations*, and any applicable federal and/or state law or regulation.

EFFECTIVE DATE: This permit shall become effective December 15, 2000, and shall supersede any previous permits and amendments. This permit shall remain in effect until notification of permit termination is received from the Metro District.

ISSUED BY:

Water Quality Investigator
City and County of Denver

Director of Regulatory and Connector Relations
Metro Wastewater Reclamation District

ACKNOWLEDGMENT OF PERMIT RECEIPT

ZERO DISCHARGE PERMIT NO. M0980-0-7777

Acme Cleaners

or any other dry cleaning facility doing business at the following address:

**1234 ABCD Street
Denver, Colorado 80202**

I have received and examined the information contained in the Zero Discharge Permit issued to the above facility, effective date December 15, 2000.

Signature

(Owner, Corporate Officer, or Manager)

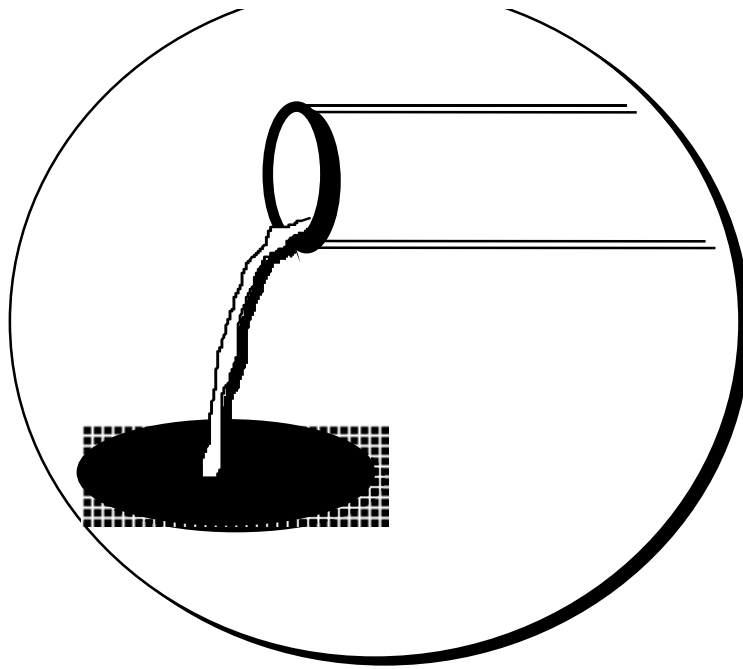
Date

Name

(Please print or type)

Position/Title

(Please print or type)



**DISCHARGE OF
PROCESS WASTES
TO THE SEWER IS
PROHIBITED**

**THIS INCLUDES:
SEPARATOR WATER, STILL OIL, WASTE PERC
IN CASE OF SPILL CALL:
WASTEWATER MANAGEMENT**

303-446-3400

AND

METRO DISTRICT AT

303-286-3000

**IN CASE OF A SPILL OR AN
ACCIDENTAL DISCHARGE
REACHING
THE SANITARY SEWER
SYSTEM**

**IMMEDIATELY NOTIFY
DENVER WASTEWATER
MANAGEMENT AT**

303-446-3400

**AND THE
METRO DISTRICT AT
303-286-3000**

Metro Wastewater Reclamation District

ZERO DISCHARGE PERMIT - ANNUAL CERTIFICATION

One of the requirements of your Zero Discharge Permit is that annually, by January 31 of each year, **you must submit a Certification Statement** to the Metro District. This Certification Statement indicates that you did, or did not, consistently comply with the requirement of not discharging perchloroethylene ("perc") or "perc"-contaminated wastes to the sanitary sewer system during the preceding calendar year.

Enclosed is a Certification Statement for the year 2000. Please sign either Statement 1 or Statement 2 and return the signed form by fax (303-286-3035) or by mail to the address provided on the Statement form by **January 31, 2001**.

Also, please add your facility's phone number in the space provided and make any changes that are necessary to the name and address provided on the form.

If you have any questions regarding your reporting requirement, please contact Rue Eich at the Metro District offices at (303) 286-3224.

Thank you for your cooperation.

Metro Wastewater Reclamation District
2000 CERTIFICATION STATEMENT

Name and _____
Address: _____

Phone: _____

(IMPORTANT !!! Sign EITHER Statement 1 or 2, below. Do NOT sign both.)

Return this page to:

Rue Eich
Metro Wastewater Reclamation District
6450 York Street
Denver, Colorado 80229

Statement 1

1. "For the period ending December 31, 2000, I certify that the above named facility **HAS CONSISTENTLY COMPLIED** with the terms and conditions of the Zero Discharge Permit and **HAS NOT DISCHARGED** any dry-cleaning process wastes to the sanitary sewer system. This includes new and used perchloroethylene ("perc"), still bottom oil, separator water, or any other wastewater containing "perc." I further certify that, to the best of my knowledge and belief, **ALL** dry-cleaning processes containing "perc" are disconnected from the sanitary sewer system, and all employees involved with the dry-cleaning process or who handle solvents and wastes have been trained to prevent "perc"-contaminated wastes from reaching the sanitary sewer system."
- 2.

_____ Name (Print or type)	_____ Title
_____ Signature (Owner, corporate officer, manager)	_____ Date (2001)

***** OR *****

Statement 2

2. "For the period ending December 31, 2000, I certify that the above named facility **HAS NOT CONSISTENTLY COMPLIED**, for any reason whatsoever, with the terms and conditions of the Zero Discharge Permit. Additional measures have been implemented or will be implemented as soon as possible, to ensure compliance with all requirements of the Zero Discharge Permit. A description of each instance of noncompliance and corrective action is attached or on file with the Metro District. I understand that this statement in no way releases my firm from administrative and/or legal actions that may be taken by the Metro District, the municipality, or other State or Federal agencies."

_____ Name (Print or type)	_____ Title
_____ Signature (Owner, corporate officer, manager)	_____ Date (2001)

Please refer to Section V. Line-by-Line Instructions for Completing EPA Form 8700-12 before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).



Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received
(For Official Use Only)

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

☐

A. Initial Notification

☐
B. Subsequent Notification
(Complete item C)

C. Installation's EPA ID Number

II. Name of Installation (Include company and specific site name)

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street

Street (Continued)

City or Town

State

Zip Code

County Code

County Name

IV. Installation Mailing Address (See instructions)

Street or P.O. Box

City or Town

State

Zip Code

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (Last)

(First)

Job Title

Phone Number (Area Code and Number)

VI. Installation Contact Address (See instructions)

A. Contact Address
Location Mailing

B. Street or P.O. Box

City or Town

State

Zip Code

VII. Ownership (See instructions)

A. Name of Installation's Legal Owner

Street, P.O. Box, or Route Number

City or Town

State

Zip Code

Phone Number (Area Code and Number)

B. Land Type

C. Owner Type

D. Change of Owner
IndicatorDate Changed
Month Day Year

ID - For Official Use Only

VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to Instructions)

A. Hazardous Waste Activities

1. Generator (See Instructions)
- ☐ a. Greater than 1000kg/mo (2,200 lbs.)
- ☐ b. 100 to 1000 kg/mo (220-2,200 lbs.)
- ☐ c. Less than 100 kg/mo (220 lbs)
2. Transporter (Indicate Mode in boxes 1-5 below)
- ☐ a. For own waste only
- ☐ b. For commercial purposes

Mode of Transportation

- ☐ 1. Air
- ☐ 2. Rail
- ☐ 3. Highway
- ☐ 4. Water
- ☐ 5. Other - specify

- ☐ 3. Treater, Storer, Disposer (at installation) Note: A permit is required for this activity, see instructions.
4. Exempt Boiler and/or Industrial Furnace
- ☐ a. Smelting, Melting, and Refining Furnace Exemption
- ☐ b. Small Quantity On-Site Burner Exemption
- ☐ 5. Underground Injection Control

C. Used Oil Management Activities

1. Used Oil Transporter/Transfer Facility - Indicate Type(s) of Activity(ies)
- ☐ a. Transporter
- ☐ b. Transfer Facility
2. Used Oil Processor/Re-refiner - Indicate Type(s) of Activity(ies)
- ☐ a. Processor
- ☐ b. Re-refiner
- ☐ 3. Off-Specification Used Oil Burner
4. Used Oil Fuel Marketer
- ☐ a. Marketer Who Directs Shipment of Off-Specification Used Oil to Used Oil Burner
- ☐ b. Marketer Who First Claims the Used Oil Meets the Specifications

B. Universal Waste Activity

- ☐ Large Quantity Handler of Universal Waste

IX. Description of Hazardous Wastes (Use additional sheets if necessary)

A. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33; See instructions if you need to list more than 12 waste codes.)

1	2	3	4	5	6
7	8	9	10	11	12

B. Characteristics of Nonlisted Hazardous Wastes. (Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles; See 40 CFR Parts 261.20 - 261.24; See instructions if you need to list more than 4 toxicity characteristic waste codes.)

(List specific EPA hazardous waste number(s) for the Toxicity Characteristic contaminant(s))

1. Ignitable (D001)	2. Corrosive (D002)	3. Reactive (D003)	4. Toxicity Characteristic	1	2	3	4

C. Other Wastes. (State-regulated or other wastes requiring a handler to have an I.D. number; See instructions.)

1	2	3	4	5	6

X. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature

Name and Official Title (Type or print)

Date Signed

XI. Comments

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section IV of the booklet for addresses.)

UNIFORM HAZARDOUS WASTE MANIFEST		1 Generator's US EPA ID No. 		Manifest Document No. 		2. Page 1 of		Information in the shaded areas is not required by Federal law						
3. Generator's Name and Mailing Address						A. State Manifest Document Number								
						B. State Generator's ID								
4. Generator's Phone ()														
5. Transporter 1 Company Name				6. US EPA ID Number 		C. State Transporter's ID								
						D. Transporter's Phone								
7. Transporter 2 Company Name				8. US EPA ID Number 		E. State Transporter's ID								
						F. Transporter's Phone								
9. Designated Facility Name and Site Address				10. US EPA ID Number 		G. State Facility's ID								
						H. Facility's Phone								
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol		I. Waste No.		
GENERATOR	a.													
	b.													
	c.													
	d.													
J. Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above								
15. Special Handling Instructions and Additional Information														
<p>16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.</p> <p>If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.</p>														
Printed/Typed Name						Signature						Month Day Year		
TRANSPORTER	17. Transporter 1 Acknowledgement of Receipt of Materials													
	Printed/Typed Name						Signature						Month Day Year	
	18. Transporter 2 Acknowledgement of Receipt of Materials													
Printed/Typed Name						Signature						Month Day Year		
FACILITY	19. Discrepancy Indication Space													
Y	20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.													
	Printed/Typed Name						Signature						Month Day Year	

APPENDIX

Table of Contents

Appendix A – List of Colorado Industrial Wastewater Pretreatment Program Contacts

Appendix B - Colorado Local Pollution Prevention (P2) Network Contact List

Appendix C - List of Colorado Local Emergency Planning Committees

APPENDIX A

LIST OF COLORADO INDUSTRIAL WASTEWATER PRETREATMENT PROGRAM CONTACTS



INDUSTRIAL WASTEWATER PRETREATMENT PROGRAM CONTACTS

NOTE: If you are not located in any of these areas, please contact the Water Quality Control Division at 303-692-3500 to ask whom you would need to contact.

Boulder, City of

Ridge Dorsey
Industrial Pretreatment Coordinator
4049 75th Street
Boulder, CO 80301
(303) 413-7361

Broomfield, City of

Dave Louch
Industrial Pretreatment Coordinator
2985 west 124th Ave.
Broomfield, CO 80020
(303) 464-5647

Boxelder Sanitation District

Sherri Jensen/Mike Carr
2217 Airway Avenue, #3
P. O. Box 1518
Fort Collins, CO 80522
(970) 498-0604

Centennial Water & Sanitation District

Al Baker
Lab Supervisor
62 West Plaza Drive
Highlands Ranch, CO 80126
(303) 791-2185 ext 523

Cherokee Metro District

Virginia Martin
1335 Valley Street
Colorado Springs, CO 80915
(719) 597-5080

Colorado Springs, City of

Bill Giannetto
Industrial Waste Administrator
703 East Las Vegas Street
Colorado Springs, CO 80903
(719) 448-4497

Delta, City of

David Smith
Environmental Compliance Officer
360 Main Street
Delta, CO 81416-1837
(970) 874-7566

Fort Collins, City of

Dave Meyer
Pollution Control Services Supervisor
3036 East Drake Road
P. O. Box 580
Fort Collins, CO 80522
(970) 221-6927

Fort Morgan, City of

Ron Shaver
Wastewater Superintendent
P. O. Box 100
Fort Morgan, CO 80701
(970) 542-0726 ext 22

Golden, City of

Vicki Coppage
Pretreatment Coordinator
1445 Tenth Street
Golden, CO 80401
(303) 384-8182

Grand Junction

Dan Tonello
Pretreatment Coordinator
250 North Fifth Street
Grand Junction, CO 81501
(970) 244-1489

Greeley, City of

Joe Kunovic
Water Quality Supervisor
300 East 8th Street
Greeley, CO 80631
(970) 350-9363

INDUSTRIAL WASTEWATER PRETREATMENT PROGRAM CONTACTS

Inverness Water & San District

Robert Ehlers
Industrial Pretreatment Coordinator
2 Inverness Drive East, Suite 101
Englewood, CO 80112
(303) 790-7434

Littleton/Englewood Bi-City WWTP

Mary Gardner
Pretreatment Administrator
2900 South Platte Drive
Englewood, CO 80110
(303) 762-2605

Louisville, City of

Ken Mason
WWTP/IPP Coordinator
749 Main Street
Louisville, CO 80027
(303) 665-7452

Metro Wastewater Reclamation District

Theresa Pfeifer
Industrial Waste Coordinator
6450 York Street
Denver, CO 80229
(303) 286-3340

Northglenn, City of

Paul Tedesco
Pretreatment & Backflow Specialist
2350 W. 112th Ave.
Northglenn, CO 80234
(303) 450-4071

La Junta, City of

Toni Arnold
Pretreatment Coordinator
P. O. Box 489
La Junta, CO 81050
(719) 384-7358/3633

Longmont, City of

Don Wagner
Pretreatment Coordinator
1100 South Sherman
Longmont, CO 80501
(303) 651-8667

Loveland, City of

Bill Thomas
Pretreatment Coordinator
200 North Wilson Avenue
Loveland, CO 80537
(970) 962-3719

Montrose, City of

Michael Carrano
Pretreatment Coordinator
P. O. Box 790
Montrose, CO 81402-0790
(970) 240-1488

Pueblo, City of

Paul Cozzetta
Pretreatment Coordinator
211 East "D" Street
Pueblo, CO 81003
(719) 543-2860

INDUSTRIAL WASTEWATER PRETREATMENT

PROGRAM CONTACTS

Security, City of

Water & Sanitation District
Ray Schweining
Assistant Superintendent
P. O. Box 5156
Colorado Springs, CO 80931
(719) 392-7844

South Adams County Water & Sanitation

J-M Grebenc
Industrial Pretreatment Manager
P. O. Box 597
Commerce City, CO 80037-0597
(303) 289-5769

South Fort Collins Sanitation District

Terry Farrill
Systems Engineer
4700 South College Avenue
Fort Collins, CO 80525
(970) 226-3104

Sterling, City of

William D. Wright
Superintendent
421 North 4th Street
Sterling, CO 80751
(970) 522-4804

Westminster, City of

Big Dry Creek Wastewater Treatment Plant
David Cross
Utilities System Specialist
13150 N. Huron Street
Westminster, CO 80234
(303) 452-8010

APPENDIX B

COLORADO LOCAL POLLUTION PREVENTION (P2) NETWORK CONTACT LIST



Colorado Local Pollution Prevention (P2) Network Contact List

<u>Organization</u>	<u>Contact</u>	<u>Phone</u>	<u>Fax</u>	<u>Email</u>
Boulder City	Sarah Van Pelt	303-441-1914	303-441-4070	vanpelts@ci.boulder.co.us
Boulder County	Anne Kaufmann Erin Vadney Jeff Zayach Joni Rix	303-441-1146 303-441-1192 303-441-1182 303-441-1438	303-441-1468	amkhe@co.boulder.co.us elvhe@co.boulder.co.us jjzhe@co.boulder.co.us jmthe@co.boulder.co.us
Boulder Energy Conservation Center		303-441-3278	303-441-4367	
CDPHE - P2	Kathy Dale Kirk Mills	303-692-2976 303-692-2977	303-782-4969	kathy.dale@state.co.us kirk.mills@state.co.us
Regulatory & Compliance Support	Jean Terry Julie Wrend Joe Schieffelin	303-692-3255 303-692-3111 303-692-3479	303-782-0278 303-782-5493	jean.terry@state.co.us julie.wrend@state.co.us joe.schieffelin@state.co.us
Office of Local Liaison	Jeff Stoll			Jeff.stoll@state.co.us
CDPHE Environmental Leadership Program	vacant	303-692-3477	303-691-7702	
City/County Denver Dept. of Env. Health	Steve Foute Janet Burgesser	303-285-4055 303-285-5611	303-285-5621	sfoute@ci.denver.co.us burgesserj@ci.denver.co.us
Eagle County EH	Laura Fawcett	970-328-8755 x756	970-328-0349	P.O. Box 179, Eagle 80631
El Paso County	John James	719-578-3139	719-578-3192	john.james@epcdhe.org
Fort Collins	Margit Hentschel	970-224-6179	970-224-6177	mhentschel@ci.fort-collins.co.us
Jefferson County	Jim Dale Dave Volkel	303-271-5718 303-271-5730	303-271-5702	jdale@co.jefferson.co.us dvolkel@co.jefferson.co.us
Larimer County	Jeannine Riess	970-498-6789	970-498-6772	riessjl@co.larimer.co.us
Longmont Water/Wastewater	Tim Tucker Don Wagner	303-651-8382 303-651-8667	303-682-9543	tim_tucker@ci.longmont.co.us
Mesa County	Cameron Garcia Sue Kiser	970-255-0754 970-248-6971	970-248-6972	cgarcia@co.mesa.co.us skiser@co.mesa.co.us
Northeast Colorado Health Department	Denise Hase Roger Hosea	970-522-3741 x120 x122	970-522-1412	dhase@rocketmail.com rogerh@nchd.org
Pueblo County	Dan Otoupalik Sarah Bruestle	719-583-4341 719-583-4526	719-583-4322	sarahb@iex.net

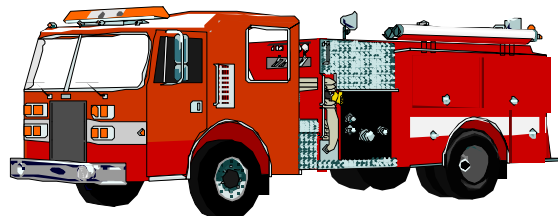
Colorado Local Pollution Prevention (P2) Network Contact List

<u>Organization</u>	<u>Contact</u>	<u>Phone</u>	<u>Fax</u>	<u>Email</u>
Shaping our Summit	Jennifer Pratt Miles	970-513-8340		sos@merid.org
Tri-County H.D.	Justin Laboe	720-322-1541	303-287-9678	justinlaboe@yahoo.com
Weld County Dept of Health & Environment	Gabri Vergara Marjie Griek	970-304-6415 x2226 x2221	970-304-6411	gvergara@co.weld.co.us mgriek@co.weld.co.us
Consultants:	Judy Dorsey Judy Heiderscheidt	970-207-0058	970-207-0059	jdorsey@frii.com JudyHP2@aol.com



APPENDIX C

LIST OF COLORADO LOCAL EMERGENCY PLANNING COMMITTEES



LOCAL EMERGENCY PLANNING COMMITTEES FOR COLORADO

CITY DISTRICTS

AURORA, City of

Jim Lancy & Tom Sawyer
1470 South Havana
Aurora, CO 80012
(303) 739-7148
(303) 739-7152

COLORADO SPRINGS, City of

Bill Ragsdale & David Helmer
31 S. Weber Street – Amtel Corp.
Colorado Springs, CO 80907-3486
(719) 385-7210 or (719) 540-1664
Fax: (719) 578-6027

MULTI-COUNTY DISTRICTS

REGION 9 (includes: Archuleta, Dolores, La Plata, Montezuma, and San Juan Counties)

Dennis Beatty
P.O. Box 666
Cortez, CO 81321
(970) 564-1246 or (970) 564-9521

REGION 10 EMERGENCY PLANNING COMMISSION (includes: Gunnison, Montrose, Ouray, San Miguel, Delta and Hinsdale Counties)

Dennis Spritzer
P.O. Box 239
Gunnison, CO 81230
(303) 728-3579

5th REGIONAL EMERGENCY PLANNING COMMISSION (includes: Summit, Lake, Clear Creek & Eagle Counties)

Ray Merry, POC
P.O. Box 179
Eagle, CO 81631
(970) 328-5755; FAX (970) 328-7524

San Luis Valley (includes Alamosa, Conejos, Costilla, Mineral, Rio Grande, and Saguache)

David Stong
1315 17th Street
Alamosa, CO 81101
(719) 589-6608

SINGLE COUNTY DISTRICT LEPCs

ADAMS

Rosalie Dukart
450 South 4th Avenue
Brighton, CO 80601-3137
(303) 289-5441

ARAPAHOE

Pat Sullivan
5686 South Court Place
Littleton, CO 80120
(303) 795-4701

BACA

Ray Miller
741 Main St
Springfield, CO 81073
(719) 523-6532

BENT

Bill Deal
714 5th St
Las Animas, CO 81054
(719) 456-1825

BOULDER

Larry Stern
1805 33rd Street
Boulder, CO 80301
(303) 441-3637

CHAFFEE

Carl Hasselbrink
P.O. Box 699
Salida, CO 81201
(719) 539-7459

CHEYENNE

James Blair
P.O. Box 363
Cheyenne Wells, CO 80810
(719) 767-5633

CLEAR CREEK

Edward G. Rapp
P.O. Box 2000
Georgetown, CO 80444
(303) 534-5777 x212

CROWLEY

Bob Johnson
6th and Main
Ordway, CO 81063
(719) 267-3248

CUSTER

Bill Dunlap
702 Rosita
Westcliff, CO 81252
(719) 783-2270 /fax-719-783-9085

DELTA

Kelly Shea c/o D. Freeman
P.O. Box 172
Delta, CO 81416
(970) 874-2004

DENVER

Kim Stiegelmeier
1437 Bannock Street, Room # 3
Denver, CO 80202
(720) 865-7600

SINGLE COUNTY DISTRICT LEPCs

DOUGLAS

Jim Raymond
4000 Justice Way #363
Castle Rock, CO 80104
(303) 660-7589

EAGLE

C/O 5th District DA-REPC
P.O. Box 488
Breckenridge, CO 80424
(970) 453-2327 FAX 7524

ELBERT

Valerie Lightbody
P.O. Box 295
Kiowa, CO 80117
(303) 621-3179

EL PASO

Jim Mesite
P.O. Box 2007
Colorado Springs, CO 80901
(719) 575-8400

FREMONT

Tom Anderson
161 Justice Center Road
Canon City, CO 81212
(719) 275-2000 x286

GARFIELD

Guy Meyer
109 8th Street, Suite 102
Glenwood Springs, CO 81601
(970) 945-9789

GILPIN

Everette Rossbach
P.O. Box EE
Black Hawk, CO 80422
(303) 582-0426/582-3132

GRAND

Kevin Neb
308 Byers Avenue
Hot Sulphur Springs, CO 80451
(970) 887-2732

GUNNISON

JoAnn Stone
200 E. Virginia
Gunnison, CO 81230
(970) 641-2481

HINSDALE

Bill Dennison-Sheriff
P.O. Box 127
Lake City, CO 81235
(970) 944-2228

JACKSON

Dennis Brinker
P.O. Box 337
Walden, CO 80480
(970) 723-4706

JEFFERSON

Judy Peratt/Tim Gablehouse
100 Jefferson County Parkway
Golden, CO 80419-1530
(303) 271-8215/572-0050

SINGLE COUNTY DISTRICT LEPCs

KIOWA

Cardon Berry
Box 591
Eads, CO 81036
(719) 438-4521

KIT CARSON

Darcy Janssen
23200 Hwy. 385
Burlington, CO 80807
(719) 346-8538/ fax 719-346-8542

LAKE

Don Seppi
P.O. Box 513
Leadville, CO 80461
(719) 486-1796

LARIMER

Erik Nilsson, EMU
P.O. Box 1190
Fort Collins, CO 80522
(970) 498-5310

LAS ANIMAS

Mike Bailey
200 E. 1st Street #201
Trinidad, CO 81082
(719) 846-4401

LINCOLN

Roxie Devers
P.O. Box 39
Hugo, CO 80821
(719) 743-2810

LOGAN

Harold Getz
P.O. Box 1107
Sterling, CO 80751
(970) 522-1373

MESA

Kim Parker
P.O. Box 14000
Grand Junction, CO 81502
(970) 244-1763

MOFFAT

Clyde Anderson
221 West Victory Way
Craig, CO 81625
(970) 824-4495

MONTROSE

Bob Pistor
C/O Montrose Fire Protection Dist.
441 S. Uncompahgre
Montrose, CO 81401
(970) 249-9181

MORGAN

Kevin Kuretich
P.O. Box 1130
Fort Morgan, CO 80701
(970) 867-8531

OTERO

Barry Shioshita
Box 511
LaJunta, CO 81050
(719) 384-5941

SINGLE COUNTY DISTRICT LEPCs

OURAY

Jake Rowe
P.O.Box 773
Ouray, Co 81427
(970) 325-4106

PHILLIPS

Randy Schafer
County Courthouse
Holyoke, CO 80731
(970) 854-3778

PROWERS

Steffon Warn
P.O. Box 829
Lamar, CO 81502
(719) 336-2674

RIO BLANCO

John Hutchkins
P.O. Box 647
Meeker, CO 81641
(970) 878-5023

SAN MIGUEL

Kevin Dunkak
P.O. Box 1598
Telluride, CO 81435
(970) 728-9332

SUMMIT

Abbie Cobb
County Courthouse
P.O. Box 68
Breckenridge, CO 80424
(970) 453-2561 x141

PARK

County Commission
P.O. Box 220
Fairplay, CO 80440
(719) 836-2771

PITKIN

Tom Dunlop
130 S Galena St
Aspen, CO 81611
(970) 920-5073

PUEBLO

Karen Ashcraft	Terry Furney
320 W. 10 th Street, B1	1551 Bonforte
Pueblo, CO 81003	Pueblo, CO 81001
(719) 583-6202	(719) 542-1352

ROUTT

Chuck Vale
Box 773598
Steamboat Springs, CO 80477
(970) 276-4138

SEDGWICK

Dean Stevens
310 E. 4th
Julesburg, CO 80813
(303) 474-2806

TELLER

Jim Leideritz
P.O. Box 9015
Divide, CO 80814
(719) 687-8648

SINGLE COUNTY DISTRICT LEPCs

WASHINGTON

George Severin
150 Ash
Akron, CO 80720
(970) 345-2701

WELD

Ed Herring
910 10th Avenue
Greeley, CO 80631
(970) 356-4015

YUMA

Roger Brown
P.O. Box 512
Yuma, CO 80759
(970) 848-3799

FOR INFORMATION ONLY

**Ute Mountain Indian Reservation
Reservation**

Tribal Council
Darwin Whitemar
P.O. Box 42
Towac, CO 81334
(303) 565-3751

Southern Ute Indian

Tribal Council
Cheryl Wiescamp
P.O. Box 737
Ignacio, CO 81137
(303) 563-4511/4525

Colorado Emergency Planning Commission: Right-to-Know

Golden Office
Admin/Plans
15075 Golden Road
Golden, CO 80401 (303) 273-1619

Colorado Department of Public Health and Environment

Susan Jones-Hard
4300 Cherry Creek Drive South
Denver, CO 80246
(303) 692-3020

General Right-to-Know Information (CDPHE)

Kirk Mills
4300 Cherry Creek Drive South
Denver, CO 80246
Desk: (303) 692-2977 Fax: (303) 782-4969
Email: kirk.mills@state.co.us



Colorado Department
of Public Health
and Environment



APPENDI X A

LIST OF COLORADO INDUSTRIAL WASTEWATER PRETREATMENT PROGRAM CONTACTS



INDUSTRIAL WASTEWATER PRETREATMENT PROGRAM CONTACTS

NOTE: If you are not located in any of these areas, please contact the Water Quality Control Division at 303-692-3500 to ask whom you would need to contact.

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Ridge Dorsey
Industrial Pretreatment Coordinator
4049 75th Street
Boulder, CO 80301
(303) 413-7361

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Dave Louch
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Lab Supervisor
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Virginia Martin
1335 Valley Street
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Colorado Springs, City of

Bill Giannetto
Industrial Waste Administrator
703 East Las Vegas Street
Colorado Springs, CO 80903
(719) 448-4497

Delta, City of

David Smith
Environmental Compliance Officer
360 Main Street
Delta, CO 81416-1837
(970) 874-7566

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Dave Meyer
Pollution Control Services Supervisor
3036 East Drake Road
P. O. Box 580
Fort Collins, CO 80522
(970) 221-6927

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Ron Shaver
Wastewater Superintendent
P. O. Box 100
Fort Morgan, CO 80701
(970) 542-0726 ext 22

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Vicki Coppage
Pretreatment Coordinator
1445 Tenth Street
Golden, CO 80401
(303) 384-8182

Grand Junction

Dan Tonello
Pretreatment Coordinator
250 North Fifth Street
Grand Junction, CO 81501
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Joe Kunovic
Water Quality Supervisor
300 East 8th Street
Greeley, CO 80631
(970) 350-9363

INDUSTRIAL WASTEWATER PRETREATMENT PROGRAM CONTACTS

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Industrial Pretreatment Coordinator
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Englewood, CO 80112
(303) 790-7434

Littleton/Englewood Bi-City WWTP

Mary Gardner
Pretreatment Administrator
2900 South Platte Drive
Englewood, CO 80110
(303) 762-2605

Louisville, City of

Ken Mason
WWTP/IPP Coordinator
749 Main Street
Louisville, CO 80027
(303) 665-7452

Metro Wastewater Reclamation District

Theresa Pfeifer
Industrial Waste Coordinator
6450 York Street
Denver, CO 80229
(303) 286-3340

Northglenn, City of

Paul Tedesco
Pretreatment & Backflow Specialist
2350 W. 112th Ave.
Northglenn, CO 80234
(303) 450-4071

La Junta, City of

Toni Arnold
Pretreatment Coordinator
P. O. Box 489
La Junta, CO 81050
(719) 384-7358/3633

Longmont, City of

Don Wagner
Pretreatment Coordinator
1100 South Sherman
Longmont, CO 80501
(303) 651-8667

Loveland, City of

Bill Thomas
Pretreatment Coordinator
200 North Wilson Avenue
Loveland, CO 80537
(970) 962-3719

Montrose, City of

Michael Carrano
Pretreatment Coordinator
P. O. Box 790
Montrose, CO 81402-0790
(970) 240-1488

Pueblo, City of

Paul Cozzetta
Pretreatment Coordinator
211 East "D" Street
Pueblo, CO 81003
(719) 543-2860

INDUSTRIAL WASTEWATER PRETREATMENT

PROGRAM CONTACTS

Security, City of

Water & Sanitation District
Ray Schweining
Assistant Superintendent
P. O. Box 5156
Colorado Springs, CO 80931
(719) 392-7844

South Adams County Water & Sanitation

J-M Grebenc
Industrial Pretreatment Manager
P. O. Box 597
Commerce City, CO 80037-0597
(303) 289-5769

South Fort Collins Sanitation District

Terry Farrill
Systems Engineer
4700 South College Avenue
Fort Collins, CO 80525
(970) 226-3104

Sterling, City of

William D. Wright
Superintendent
421 North 4th Street
Sterling, CO 80751
(970) 522-4804

Westminster, City of

Big Dry Creek Wastewater Treatment Plant
David Cross
Utilities System Specialist
13150 N. Huron Street
Westminster, CO 80234
(303) 452-8010

APPENDIX B

COLORADO LOCAL POLLUTION PREVENTION (P2) NETWORK CONTACT LIST



Colorado Local Pollution Prevention (P2) Network Contact List

<u>Organization</u>	<u>Contact</u>	<u>Phone</u>	<u>Fax</u>	<u>Email</u>
Boulder City	Sarah Van Pelt	303-441-1914	303-441-4070	vanpelts@ci.boulder.co.us
Boulder County	Anne Kaufmann	303-441-1146	303-441-1468	amkhe@co.boulder.co.us
	Erin Vadney	303-441-1192		elvhe@co.boulder.co.us
	Jeff Zayach	303-441-1182		jjzhe@co.boulder.co.us
	Joni Rix	303-441-1438		jmthe@co.boulder.co.us
Boulder Energy Conservation Center		303-441-3278	303-441-4367	
CDPHE - P2	Kathy Dale	303-692-2976	303-782-4969	kathy.dale@state.co.us
	Kirk Mills	303-692-2977		kirk.mills@state.co.us
Regulatory & Compliance Support	Jean Terry	303-692-3255	303-782-0278	jean.terry@state.co.us
	Julie Wrend	303-692-3111	303-782-5493	julie.wrend@state.co.us
	Joe Schieffelin	303-692-3479		joe.schieffelin@state.co.us
Office of Local Liaison	Jeff Stoll			Jeff.stoll@state.co.us
CDPHE Environmental Leadership Program	vacant	303-692-3477	303-691-7702	
City/County Denver Dept. of Env. Health	Steve Foute	303-285-4055	303-285-5621	sfoute@ci.denver.co.us
	Janet Burgesser	303-285-5611		burgesserj@ci.denver.co.us
Eagle County EH	Laura Fawcett	970-328-8755 x756	970-328-0349	P.O. Box 179, Eagle 80631
El Paso County	John James	719-578-3139	719-578-3192	john.james@epcdhe.org
Fort Collins	Margit Hentschel	970-224-6179	970-224-6177	mhentschel@ci.fort-collins.co.us
Jefferson County	Jim Dale	303-271-5718	303-271-5702	jdale@co.jefferson.co.us
	Dave Volkel	303-271-5730		dvolkel@co.jefferson.co.us
Larimer County	Jeannine Riess	970-498-6789	970-498-6772	riessjl@co.larimer.co.us
Longmont Water/Wastewater	Tim Tucker	303-651-8382	303-682-9543	tim_tucker@ci.longmont.co.us
	Don Wagner	303-651-8667		
Mesa County	Cameron Garcia	970-255-0754		cgarcia@co.mesa.co.us
	Sue Kiser	970-248-6971	970-248-6972	skiser@co.mesa.co.us
Northeast Colorado Health Department	Denise Hase	970-522-3741	970-522-1412	dhase@rocketmail.com
	Roger Hosea	x120 x122		rogerh@nchd.org
Pueblo County	Dan Otoupalik	719-583-4341	719-583-4322	
	Sarah Bruestle	719-583-4526		sarahb@iex.net

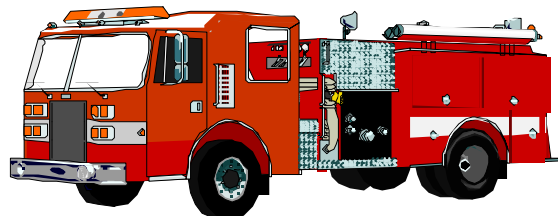
Colorado Local Pollution Prevention (P2) Network Contact List

<u>Organization</u>	<u>Contact</u>	<u>Phone</u>	<u>Fax</u>	<u>Email</u>
Shaping our Summit	Jennifer Pratt Miles	970-513-8340		sos@merid.org
Tri-County H.D.	Justin Laboe	720-322-1541	303-287-9678	justinlaboe@yahoo.com
Weld County Dept of Health & Environment	Gabri Vergara	970-304-6415	970-304-6411	gvergara@co.weld.co.us
	Marjie Griek	x2226 x2221		mgriek@co.weld.co.us
Consultants:	Judy Dorsey Judy Heiderscheidt	970-207-0058	970-207-0059	jdorsey@frii.com JudyHP2@aol.com



APPENDIX C

LIST OF COLORADO LOCAL EMERGENCY PLANNING COMMITTEES



LOCAL EMERGENCY PLANNING COMMITTEES FOR COLORADO

CITY DISTRICTS

AURORA, City of

Jim Lancy & Tom Sawyer
1470 South Havana
Aurora, CO 80012
(303) 739-7148
(303) 739-7152

COLORADO SPRINGS, City of

Bill Ragsdale & David Helmer
31 S. Weber Street – Amtel Corp.
Colorado Springs, CO 80907-3486
(719) 385-7210 or (719) 540-1664
Fax: (719) 578-6027

MULTI-COUNTY DISTRICTS

REGION 9 (includes: Archuleta, Dolores, La Plata, Montezuma, and San Juan Counties)

Dennis Beatty
P.O. Box 666
Cortez, CO 81321
(970) 564-1246 or (970) 564-9521

REGION 10 EMERGENCY PLANNING COMMISSION (includes: Gunnison, Montrose, Ouray, San Miguel, Delta and Hinsdale Counties)

Dennis Spritzer
P.O. Box 239
Gunnison, CO 81230
(303) 728-3579

5th REGIONAL EMERGENCY PLANNING COMMISSION (includes: Summit, Lake, Clear Creek & Eagle Counties)

Ray Merry, POC
P.O. Box 179
Eagle, CO 81631
(970) 328-5755; FAX (970) 328-7524

San Luis Valley (includes Alamosa, Conejos, Costilla, Mineral, Rio Grande, and Saguache)

David Stong
1315 17th Street
Alamosa, CO 81101
(719) 589-6608

SINGLE COUNTY DISTRICT LEPCs

ADAMS

Rosalie Dukart
450 South 4th Avenue
Brighton, CO 80601-3137
(303) 289-5441

ARAPAHOE

Pat Sullivan
5686 South Court Place
Littleton, CO 80120
(303) 795-4701

BACA

Ray Miller
741 Main St
Springfield, CO 81073
(719) 523-6532

BENT

Bill Deal
714 5th St
Las Animas, CO 81054
(719) 456-1825

BOULDER

Larry Stern
1805 33rd Street
Boulder, CO 80301
(303) 441-3637

CHAFFEE

Carl Hasselbrink
P.O. Box 699
Salida, CO 81201
(719) 539-7459

CHEYENNE

James Blair
P.O. Box 363
Cheyenne Wells, CO 80810
(719) 767-5633

CLEAR CREEK

Edward G. Rapp
P.O. Box 2000
Georgetown, CO 80444
(303) 534-5777 x212

CROWLEY

Bob Johnson
6th and Main
Ordway, CO 81063
(719) 267-3248

CUSTER

Bill Dunlap
702 Rosita
Westcliff, CO 81252
(719) 783-2270 /fax-719-783-9085

DELTA

Kelly Shea c/o D. Freeman
P.O. Box 172
Delta, CO 81416
(970) 874-2004

DENVER

Kim Stiegelmeier
1437 Bannock Street, Room # 3
Denver, CO 80202
(720) 865-7600

SINGLE COUNTY DISTRICT LEPCs

DOUGLAS

Jim Raymond
4000 Justice Way #363
Castle Rock, CO 80104
(303) 660-7589

EAGLE

C/O 5th District DA-REPC
P.O. Box 488
Breckenridge, CO 80424
(970) 453-2327 FAX 7524

ELBERT

Valerie Lightbody
P.O. Box 295
Kiowa, CO 80117
(303) 621-3179

EL PASO

Jim Mesite
P.O. Box 2007
Colorado Springs, CO 80901
(719) 575-8400

FREMONT

Tom Anderson
161 Justice Center Road
Canon City, CO 81212
(719) 275-2000 x286

GARFIELD

Guy Meyer
109 8th Street, Suite 102
Glenwood Springs, CO 81601
(970) 945-9789

GILPIN

Everette Rossbach
P.O. Box EE
Black Hawk, CO 80422
(303) 582-0426/582-3132

GRAND

Kevin Neb
308 Byers Avenue
Hot Sulphur Springs, CO 80451
(970) 887-2732

GUNNISON

JoAnn Stone
200 E. Virginia
Gunnison, CO 81230
(970) 641-2481

HINSDALE

Bill Dennison-Sheriff
P.O. Box 127
Lake City, CO 81235
(970) 944-2228

JACKSON

Dennis Brinker
P.O. Box 337
Walden, CO 80480
(970) 723-4706

JEFFERSON

Judy Peratt/Tim Gablehouse
100 Jefferson County Parkway
Golden, CO 80419-1530
(303) 271-8215/572-0050

SINGLE COUNTY DISTRICT LEPCs

KIOWA

Cardon Berry
Box 591
Eads, CO 81036
(719) 438-4521

KIT CARSON

Darcy Janssen
23200 Hwy. 385
Burlington, CO 80807
(719) 346-8538/ fax 719-346-8542

LAKE

Don Seppi
P.O. Box 513
Leadville, CO 80461
(719) 486-1796

LARIMER

Erik Nilsson, EMU
P.O. Box 1190
Fort Collins, CO 80522
(970) 498-5310

LAS ANIMAS

Mike Bailey
200 E. 1st Street #201
Trinidad, CO 81082
(719) 846-4401

LINCOLN

Roxie Devers
P.O. Box 39
Hugo, CO 80821
(719) 743-2810

LOGAN

Harold Getz
P.O. Box 1107
Sterling, CO 80751
(970) 522-1373

MESA

Kim Parker
P.O. Box 14000
Grand Junction, CO 81502
(970) 244-1763

MOFFAT

Clyde Anderson
221 West Victory Way
Craig, CO 81625
(970) 824-4495

MONTROSE

Bob Pistor
C/O Montrose Fire Protection Dist.
441 S. Uncompahgre
Montrose, CO 81401
(970) 249-9181

MORGAN

Kevin Kuretich
P.O. Box 1130
Fort Morgan, CO 80701
(970) 867-8531

OTERO

Barry Shioshita
Box 511
LaJunta, CO 81050
(719) 384-5941

SINGLE COUNTY DISTRICT LEPCs

OURAY

Jake Rowe
P.O.Box 773
Ouray, Co 81427
(970) 325-4106

PHILLIPS

Randy Schafer
County Courthouse
Holyoke, CO 80731
(970) 854-3778

PROWERS

Steffon Warn
P.O. Box 829
Lamar, CO 81502
(719) 336-2674

RIO BLANCO

John Hutchkins
P.O. Box 647
Meeker, CO 81641
(970) 878-5023

SAN MIGUEL

Kevin Dunkak
P.O. Box 1598
Telluride, CO 81435
(970) 728-9332

SUMMIT

Abbie Cobb
County Courthouse
P.O. Box 68
Breckenridge, CO 80424
(970) 453-2561 x141

PARK

County Commission
P.O. Box 220
Fairplay, CO 80440
(719) 836-2771

PITKIN

Tom Dunlop
130 S Galena St
Aspen, CO 81611
(970) 920-5073

PUEBLO

Karen Ashcraft 320 W. 10 th Street, B1 Pueblo, CO 81003 (719) 583-6202	Terry Furney 1551 Bonforte Pueblo, CO 81001 (719) 542-1352
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ROUTT

Chuck Vale
Box 773598
Steamboat Springs, CO 80477
(970) 276-4138

SEDGWICK

Dean Stevens
310 E. 4th
Julesburg, CO 80813
(303) 474-2806

TELLER

Jim Leideritz
P.O. Box 9015
Divide, CO 80814
(719) 687-8648

SINGLE COUNTY DISTRICT LEPCs

WASHINGTON

George Severin
150 Ash
Akron, CO 80720
(970) 345-2701

WELD

Ed Herring
910 10th Avenue
Greeley, CO 80631
(970) 356-4015

YUMA

Roger Brown
P.O. Box 512
Yuma, CO 80759
(970) 848-3799

FOR INFORMATION ONLY

**Ute Mountain Indian Reservation
Reservation**

Tribal Council
Darwin Whitemar
P.O. Box 42
Towac, CO 81334
(303) 565-3751

Southern Ute Indian

Tribal Council
Cheryl Wiescamp
P.O. Box 737
Ignacio, CO 81137
(303) 563-4511/4525

Colorado Emergency Planning Commission: Right-to-Know

Golden Office
Admin/Plans
15075 Golden Road
Golden, CO 80401 (303) 273-1619

Colorado Department of Public Health and Environment

Susan Jones-Hard
4300 Cherry Creek Drive South
Denver, CO 80246
(303) 692-3020

General Right-to-Know Information (CDPHE)

Kirk Mills
4300 Cherry Creek Drive South
Denver, CO 80246
Desk: (303) 692-2977 Fax: (303) 782-4969
Email: kirk.mills@state.co.us



Colorado Department
of Public Health
and Environment



"...to protect human health and to safeguard the natural environment..."