Dry Cleaners: Reporting Releases

Background
Dry cleaners are required to report leaks and releases of more than one pound of dry cleaning solvent that occur outside of any containment pan. This fact sheet explains dry cleaner release reporting requirements. A release can be a leak, spill, or equipment malfunction.

Complying with the requirements described in this fact sheet is necessary for your facility to be eligible to be cleaned up using funding from the Dry Cleaner Environmental Response Account.

What Releases need to be reported?
All dry cleaning solvents have a “Reportable Quantity” or “RQ” of one pound. If more than one pound of any dry cleaning solvent is released into the environment within a 24 hour period, the release is reportable. This RQ applies to all dry cleaning solvents. This RQ also applies to mixtures of solvents and other materials. For example, if a mixture of water and solvent is released, and the mixture is more than one pound, this would be a reportable quantity.

Examples of releases that enter the environment include:
- A release of dry cleaning solvent onto the floor, soil, sewer, drain, or emitted into the air.
- A release of solvent that goes onto your neighbor’s property.
- A solvent release outside your facility that flows into a storm drain. Such as during solvent delivery.
- A release of dry cleaning solvent inside your store that is not inside your containment pan, such as a pipe bursting.

What Releases Do Not Need To Be Reported?
A release of dry cleaning solvent that is less than one pound does not need to be reported. A release or a release that exceeds one pound does not need to be reported if:
- The release is fully contained in a containment pan, and
- The release is cleaned up immediately, and
- The cause of the release is immediately repaired.

Recordkeeping
Dry cleaners should keep a log of all spills, leaks and releases due to equipment malfunction. Use the Dry Cleaner Compliance Calendar to keep the log at your shop. DEQ will ask for information on releases at your shop as part of the annual report to DEQ. This information will help DEQ know whether the waste minimization requirements for dry cleaners are preventing contamination. The log should include date of release, amount and type of release, location of release, and how the cause of the release was repaired. This log is part of the leak detection and repair records required of dry cleaners by the federal Clean Air Act.

How Should a Dry Cleaner Report a Release?
If you release more than one pound of dry cleaning solvent, call Oregon Emergency Response System (OERS) toll-free at 1-800-452-0311. OERS will take information from you about the release, and then pass this information along to DEQ. Depending on the circumstances, DEQ will call you back to get more information, and may request a written release report.

A release may also need to be reported to the federal National Response Center (NRC). Reporting a release to the state does NOT fulfill your requirement to report to the NRC. If you have a release that exceeds the federal RQs, call the NRC toll-free at 1-800-424-8802. All releases should be reported as soon as you are aware of the release. If you have a question about whether a release is reportable, go ahead and report. The following table outlines both state and federal RQs:

<table>
<thead>
<tr>
<th>State and Federal Reportable Quantities</th>
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<tbody>
<tr>
<td>Perchloroethylene</td>
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<tr>
<td>Oregon</td>
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<td>1 lb. = approx. 1 cup</td>
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Note: If you have a reportable release, and you don’t report, you are in violation of release reporting requirements and you may jeopardize the cleanup liability relief provided by the dry cleaner statute.

Last updated 8/6/2018
By: M. Frister
What Should I Do If I Have A Release?
If a release is relatively small and contained, then it can probably be easily cleaned up by the dry cleaner. Follow the instructions on the DEQ poster *Dry Cleaner Solvents: What to Do If You Have a Release or Leak*, which should be posted in so the information is immediately available to the employees of the dry cleaning facility.

If a release is large and can affect the environment (by flowing into a storm sewer or soaking into soil) or contaminate a neighbor’s property, it may be necessary to call an emergency response company or a local hazardous material response unit. Post these telephone numbers before you ever need them!

How can I prepare for a release?
Before a release occurs, make sure that you:

- Post emergency telephone numbers by the telephone.
- Have the proper equipment on hand to manage releases (safety gear, absorbent material).
- Make sure your employees know where emergency equipment is stored, and the proper procedures to follow.

After a release has been cleaned up, take some time to think about how the release could have been avoided, and how you could improve your response to the release.

Release prevention practices
Good release prevention practices include:

- Inspection for leaks at least every week as required by the Clean Air Act. This will help ensure items, such as, fittings, valves, pumps and other parts of your dry cleaning machine are in good condition.
- Keeping solvent containers, hazardous waste and waste water containers closed and in containment pans. Make sure those containers are in good condition.
- Operating equipment according to manufacturer recommendations.
- Storing only as much cleaning supplies as you need.
- Installing containment pans under and around all items of equipment where solvent is used, treated or stored as required.
- Making sure your employees know how to properly manage the solvents and other hazardous materials used at your facility.
- Use closed, direct-coupled equipment when delivering or transferring solvent.

For more information about Oregon’s Dry Cleaner Program visit DEQ’s dry cleaner webpage: [https://www.oregon.gov/deq/Hazards-and-Cleanup/Pages/Dry-Cleaner.aspx](https://www.oregon.gov/deq/Hazards-and-Cleanup/Pages/Dry-Cleaner.aspx)

Who do I call with questions?
For any questions about containing solvents at your facility or about the Oregon Dry Cleaner Program in general, contact the Dry Cleaner Program Coordinator, Nancy Cardwell at 503-229-6240, or call toll-free in Oregon at 1-800-452-4011 or e-mail drycleanerinfo@deq.state.or.us

Alternative formats
Documents can be provided upon request in an alternate format for individuals with disabilities or in a language other than English for people with limited English skills. To request a document in another format or language, call DEQ in Portland at 503-229-5696, or toll-free in Oregon at 1-800-452-4011, ext. 5696; or email deqinfo@deq.state.or.us.