



Environmental Compliance Audit for Dry Cleaning Establishments

Michigan Department of Environmental Quality ♦ Environmental Science and Services Division ♦ 800-662-9278

Facility Name:		Date of Audit (MM/DD/YYYY):	
Facility Address:	City	State:	Zip:
Name of Person Conducting Audit:		Phone:	

- Refer to Chapters 1 through 6 of the “Michigan Dry Cleaning Environmental Compliance Workbook” to answer the questions in this audit.
- Answer all questions, unless you are directed to skip a question. Do not answer questions that you are directed to skip

Air Quality Regulations (Workbook Chapter 1)

A1. Does your facility use Perchloroethylene? Yes No - Skip to A8

- A2. What NESHAP requirements are you subject to? (select from the list below)
- If you have a **dry-to-dry machine** and are a “**major**” source see Table 1-2 in Workbook
 - If you have a **dry-to-dry machine** and are a “**large**” source see Table 1-3 in Workbook
 - If you have a **dry-to-dry machine** and are a “**small**” source see Table 1-4 in Workbook
 - If you have a **transfer machine** system and are a “**major**” source see Table 1-5 in Workbook
 - If you have a **transfer machine** system and are a “**large**” source see Table 1-6 in Workbook
 - If you have a **transfer machine** system and are a “**small**” source see Table 1-7 in Workbook

- A3. Are you complying with the requirements in:
- Table 1-2 if you are a Major Source with dry-to dry machine
 - Table 1-3 if you are a Large Source with dry-to dry machine
 - Table 1-4 if you are a Small Source with dry-to dry machine Yes No - Out of Compliance
 - Table 1-5 if you are a Major Source with transfer machine
 - Table 1-6 if you are a Large Source with transfer machine
 - Table 1-7 if you are a Small Source with transfer machine

Environmental Compliance Audit for Dry Cleaning Establishments

A4. Are you in compliance with the NESHAP Pollution Prevention Requirements identified in Table 1-8? Yes No - Out of Compliance

A5. Are you in compliance with the NESHAP recordkeeping requirements identified in Table 1-9? Yes No - Out of Compliance

A6. Did you submit the following reports?
• Initial Notification Report
• Compliance Report for Pollution Prevention
• Compliance Report for Control Requirements Yes No - Out of Compliance

A7. Have you been paying your NESHAP air quality fee? Yes No - Out of Compliance

A8. Does your facility use petroleum solvents? Yes No - Skip to A11

A9. Are you subject to the NSPS for Petroleum Drycleaners? Yes No - Skip to A11

A10. Are you in compliance with the NSPS requirements identified in Table 1-11? Yes No - Out of Compliance

A11. Does any of the equipment at your facility exceed the following thresholds?
 Boiler that burns only natural gas and has a heat input capacity of over 50,000,000 BTU/hr.
 Oil-fired boiler that has a heat input of more than 20,000,000 BTU/hr or that burns oil containing more than 0.40 percent sulfur by weight. Yes No - Skip to A13
 Perc or petroleum dry cleaning machine with a capacity of over 100 pounds of clothes.
 Solvent distillation equipment that has a rated batch capacity of more than 55 gallons.

A12. Have you obtained a Permit to Install for the equipment from the DEQ, Air Quality Division? Yes No - Out of Compliance

A13. Does facility meet any of the following criteria:

- Have only dry-to-dry machines and consume more than 2,100 gallons of perc in a year
- Have only transfer machines and consume more than 1,800 gallons of perc in a year
- Have both transfer and dry-to-dry machines and consume more than 1,800 gallons of perc in a year
- Use petroleum solvents or other non-perc solvents and have the “potential to emit” over 100 tons of volatile organic compounds (VOCs) in one year.

Yes No - Skip to A15

A14. Have you applied for or been issued a Renewable Operating Permit (ROP)?

Yes No - Out of Compliance

A15. Is your facility:

- Subject to the ROP Program
- OR**
- Subject to the NSPS for dry cleaning establishments

Yes No - Skip to B1

A16. Do you submit a MAERS report?

Yes No - Out of Compliance

Waste Management Regulations *(Workbook Chapter 2)*

B1. Have you reviewed the “Best Management Practices - Waste Reduction Opportunities?”

Yes No - Recommended

B2. Have you implemented any measures to reduce the amount of waste generated at your facility?

Yes No - Recommended

B3. Is the solid waste generated at your facility stored and discarded according to the guidelines identified in Table 2-1?

Yes No - Out of Compliance

B4. Have you instituted any of the best management practices for solid waste management identified in Table 2-2?

Yes No - Recommended

B5. Does your establishment generate any liquid industrial waste?

Yes No - Skip to B8

B6. Do you store any liquid industrial waste on-site?

Yes No - Skip to B8

B7. Are you in compliance with the liquid industrial waste requirements identified in Table 2-3? Yes No - Out of Compliance

B8. Do you generate any of following "universal" wastes:

- Electric lamps including spent fluorescent tubes, high intensity discharge, sodium vapor, mercury vapor, neon, and incandescent lamps.
- Batteries, including lead acid and dry cell types Yes No - Skip to B10
- Thermometers, thermostats and other devices that contain mercury
- Televisions and computer monitors
- Pesticides

B9. Are you managing your universal waste according to the universal waste requirements identified in Table 2-4? Yes No - These wastes must be managed as hazardous wastes.

B10. Do you generate any listed or characteristic hazardous wastes that are not managed as universal wastes? (review the examples in Tables 2-5 and 2-6) Yes No - Skip to C1

B11. Have you kept the records, test results, MSDSs, or other documentation used for your waste determinations for at least three years from the last date your hazardous waste was sent to a disposal facility? Yes No - Out of Compliance

B12. What is your generator status?

- Conditionally Exempt Small Quantity Generator (CESQG) - Answer questions B13 through B24
- Small Quantity Generator (SQG) - Answer questions B25 through B38
- Large Quantity Generator (LQG) - contact your WHMD district office to discuss your requirements. Skip to question C1.

CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR REQUIREMENTS

B13. Does your CESQG facility ship liquid waste off-site? Yes No - Skip to B15

B14. Does your CESQG facility have a site identification number? Yes No - Out of Compliance

B15. Is there less than 2,200 pounds of hazardous waste on-site? Yes No - Out of Compliance

B16. Are you managing your hazardous waste containers in accordance with the requirements identified in Table 2-7? Yes No - Out of Compliance

Environmental Compliance Audit for Dry Cleaning Establishments

B17. Have you instituted any of the best management practices for container management identified in Table 2-8? Yes No - Recommended

B18. Is the CESQG hazardous waste that is stored in accumulation areas labeled? Yes No - Out of Compliance

B19. Is hazardous waste that is being shipped off-site in compliance with the labeling requirements identified in Table 2-9? Yes No - Out of Compliance

B20. Have you instituted any of the best management practices for employee emergency training identified in Table 2-10? Yes No - Recommended

B21. Are you complying with the hazardous waste disposal requirements identified in Table 2-11? Yes No - Out of Compliance

B22. Have you instituted any of the best management practices for waste disposal identified in Table 2-12? Yes No - Recommended

B23. Are you required to manifest your hazardous wastes? Yes No - Skip to C1

B24. Are you complying with the manifest requirements identified in Table 2-13? Yes No - Out of Compliance

SMALL QUANTITY GENERATOR REQUIREMENTS

B25. Does your facility have a site identification number? Yes No - Out of Compliance

B26. Have you submitted a land ban notification (land disposal restriction) to your disposal facility? Yes No - Out of Compliance

B27. Is the hazardous waste in compliance with the accumulation requirements identified in Table 2-14? Yes No - Out of Compliance

B28. Are you managing your hazardous waste containers in accordance with the requirements identified in Table 2-15? Yes No - Out of Compliance

B29. Do you have over 2,200 pounds (1,000 kg) of hazardous waste on-site? Yes No - Skip to B31

B30. Are you complying with the secondary containment requirements identified in Table 2-16? Yes No - Out of Compliance

B31. Have you instituted any of the best management practices for container management identified in Table 2-17? Yes No - Recommended

B32. Is the hazardous waste that is stored in accumulation areas and satellite containers in compliance with the labeling requirements identified in Table 2-18? Yes No - Out of Compliance

B33. Is hazardous waste that is being shipped off-site in compliance with the labeling requirements identified in Table 2-19? Yes No - Out of Compliance

B34. Is your facility in compliance with the training requirements identified in Table 2-20? Yes No - Out of Compliance

B35. Have you instituted any of the best management practices for employee training identified in Table 2-21? Yes No - Recommended

B36. Are you complying with the SQG hazardous waste disposal requirements identified in Table 2-22? Yes No - Out of Compliance

B37. Are you required to manifest your hazardous waste or liquid industrial waste? Yes No - Skip to C1

B38. Are you complying with the SQG manifest requirements identified in Table 2-23? Yes No - Out of Compliance

Wastewater Management Regulations *(Workbook Chapter 3)*

C1. What type of wastewater does your business generate? Sanitary
 Nonsanitary
 Both

C2. How do you dispose of wastewater generated at your establishment?
 Municipal Sewer System (go to question C3)
 On-Site Septic System (skip to question C4)
 Holding Tank (skip to question C5)
 Surface Water (skip to question C6)

Environmental Compliance Audit for Dry Cleaning Establishments

-
- C3. Are you complying with the sewer system discharge requirements identified in Table 3-1? Yes (Skip to C7) No - Out of Compliance (Skip to C7)
-
- C4. Are you complying with the septic system discharge requirements identified in Table 3-2? Yes (Skip to C7) No - Out of Compliance (Skip to C7)
-
- C5. Are you complying with the holding tank discharge requirements identified in Table 3-3? Yes (Skip to C7) No - Out of Compliance (Skip to C7)
-
- C6. Are you complying with the surface water discharge requirements identified in Table 3-4? Yes No - Out of Compliance
-
- C7. Have you instituted any of the best management practices for wastewater discharge identified in 3.4? Yes No - Recommended
-
- C8. Do you discharge any "wastewater" from your dry cleaning process to a sewer system or waters of the state? (see definition of "wastewater" in Section 3.6) Yes No - Skip to D1
-
- C9. Have you been submitting either an Abbreviated or Full Annual Wastewater Report to the DEQ? Yes No - Out of Compliance
-

Material Storage Regulations (Workbook Chapter 4)

-
- D1. Do you store any materials that require secondary containment? (If you are unsure about what materials require secondary containment contact the Environmental Assistance Center 800-662-9278) Yes No - Skip to D3
-
- D2. Does your secondary containment comply with the requirements described in Section 4.1? Yes No - Out of Compliance
-
- D3. Do you store any materials in an underground storage tank (UST)? Yes No - Skip to D12
-
- D4. Is the UST a "regulated UST?" Yes No - Skip to D12
-
- D5. Is your UST in compliance with the requirements identified in Table 4-1? Yes No - Out of Compliance
-

Environmental Compliance Audit for Dry Cleaning Establishments

D6.	Are you installing or planning to install a new UST system?	<input type="checkbox"/> Yes	<input type="checkbox"/> No - Skip to D8
-----	---	------------------------------	--

D7.	Are you complying with the requirements for installing a new UST system identified in Table 4-2?	<input type="checkbox"/> Yes	<input type="checkbox"/> No - Out of Compliance
-----	--	------------------------------	---

D8.	Are you planning on temporarily or permanently closing a UST system or changing the material stored in the UST?	<input type="checkbox"/> Yes	<input type="checkbox"/> No - Skip to D10
-----	---	------------------------------	---

D9.	Are you complying with the appropriate requirements from Table 4-3?	<input type="checkbox"/> Yes	<input type="checkbox"/> No - Out of Compliance
-----	---	------------------------------	---

D10.	Have any materials been released from the UST?	<input type="checkbox"/> Yes	<input type="checkbox"/> No - Skip to D12
------	--	------------------------------	---

D11.	Are you complying with the release response requirements identified in Table 4-4?	<input type="checkbox"/> Yes	<input type="checkbox"/> No - Out of Compliance
------	---	------------------------------	---

D12.	Do you have any aboveground storage tanks (AST)?	<input type="checkbox"/> Yes	<input type="checkbox"/> No - Skip to E1
------	--	------------------------------	--

D13.	Does the AST meet any of the following criteria: <input type="checkbox"/> A flammable compressed gas or LPG container filling location <input type="checkbox"/> An LPG tank with a water capacity of more than 2,000 gallons, or two or more tanks with an aggregate water capacity of more than 4,000 gallons? <input type="checkbox"/> Used to supply flammable or combustible liquid with a storage capacity of more than 1,100 gallons.	<input type="checkbox"/> Yes	<input type="checkbox"/> No - Skip to E1
------	--	------------------------------	--

D14.	Are you complying with the AST requirements identified in Table 4-5?	<input type="checkbox"/> Yes	<input type="checkbox"/> No - Out of Compliance
------	--	------------------------------	---

D15.	Do you have any ASTs that are out-of-service?	<input type="checkbox"/> Yes	<input type="checkbox"/> No - Skip to E1
------	---	------------------------------	--

D16.	Are you complying with the AST out-of-service requirements identified in Table 4-6?	<input type="checkbox"/> Yes	<input type="checkbox"/> No - Out of Compliance
------	---	------------------------------	---

Environmental Planning, Reporting, and Release Reporting Regulations *(Workbook Chapter 5)*

E1. Does your facility have 10,000 pounds or more of any dry cleaning chemical on site at any one given time? Yes No - Skip to E4

E2. Have you submitted an initial report of your hazardous chemicals to the Michigan SARA Title III Program, Local Emergency Planning Committee, and local fire department? Yes No - Out of Compliance

E3. Do you submit an annual hazardous chemical Inventory (Tier II Report) to the Michigan SARA Title III Program, LEPC, and local fire department? Yes No - Out of Compliance

E4. Do you manage more than 440 pounds of "polluting materials" outdoors or 2,200 pounds indoors? Yes No - Skip to E8

E5. Are your "polluting materials" managed in containers that individually do not exceed 10 gallons **AND** stored indoors with adequate safeguards to prevent a release? Yes - Skip to E8 No

E6. Are your "polluting materials" stored in an underground storage tank or aboveground storage tank that is in compliance with the requirements described in Chapter 4? Yes - Skip to E8 No

E7. Are you complying with the PIPP requirements identified in Table 5-1? Yes No - Out of Compliance

E8. Does your facility have 1,320 gallons of storage capacity for petroleum solvents, naphtha, mineral spirits, or Stoddard Solvent? Yes No - Skip to E-10

E9. Are you complying with the SPCC requirements? Yes No - Out of Compliance

E10. Are you a SQG or CESQG of hazardous waste? (see Question B12) Yes No - Skip to E12

E11. Are you in compliance with the hazardous waste emergency preparedness and prevention requirements identified in Table 5-2? Yes No - Out of Compliance

E12. Do you know who to contact if you have a spill/release? Yes No - Refer to Table 5-3

E13. Do you know how you will respond to and clean up a spill/release, should one occur at your establishment? Yes No - Read Section 5.6

Michigan Dry Cleaning Program Regulations (Workbook Chapter 6)

F1. Is your establishment currently licensed by the DEQ? Yes No - Out of Compliance

F2. Do you conduct surveillance checks of your dry cleaning equipment? Yes No - Out of Compliance

F3. Do you have a vapor detection unit, which is used to detect vapor leaks in your equipment? Yes No - Recommended

F4. Are there at least two portable fire extinguishers with at least a 2a,10bc rating at your establishment and is one of those fire extinguishers mounted near the dry cleaning machine? Yes No - Out of Compliance

F5. Does your establishment have an approved organic vapor respirator and does that respirator meet the requirements in Section 6.7? Yes No - Out of Compliance



COMPLIANCE AUDIT COMPLETE

AUTHORITY: PA 451 of 1994, as amended
TOTAL COPIES: 200
TOTAL COST: \$143.05
COST PER COPY: \$0.72
Michigan Department of Environmental Quality



The Michigan Department of Environmental Quality (MDEQ) will not discriminate against any individual or group on the basis of race, sex, religion, age, national origin, color, marital status, disability or political beliefs. Questions or concerns should be directed to the MDEQ Office of Personnel Services, P.O. Box 30473, Lansing, MI 48909.