

Michigan Department of Environmental Quality
Environmental Results Program

Michigan Dry Cleaning Self-Audit Workbook



Jennifer Granholm, Governor
Steven E. Chester, Director

July 2007

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Michigan Dry Cleaning Self-Audit Workbook

This workbook and the accompanying self-audit forms have been designed to help you determine environmental compliance with the following areas of your dry cleaning establishment:

- Perchloroethylene Dry Cleaning Machine Part 1
- Petroleum Solvent Dry Cleaning Machine Part 2
- Waste Part 3
- Storage Tanks Part 4
- Facility Wastewater Part 5
- Safety Equipment Part 6
- Environmental Planning and Release Response (not part of the audit) Part 7

How Do I Begin?

STEP 1: Locate the Self-Audit Forms, which came with this workbook (see figure 1). You can also complete an electronic version of the Self-Audit Forms, which can be e-mailed. The electronic forms can be accessed at www.michigan.gov/degenvassistance (select Dry Cleaners).

STEP 2: Determine where you need to start your audit. This will depend on the type of dry cleaning machine(s) you have, see below:

- If you have a dry cleaning machine that uses perchloroethylene (perc) start at Part 1
- If you only have a dry cleaning machine that uses petroleum solvent start at Part 2

STEP 3: Record the answer to each question on the Self-Audit Forms. You may be asked to skip particular questions. Leave those questions blank. This workbook can be used as a guide to help you answer the questions.

STEP 4: If you are “out-of-compliance” with a requirement, the audit question will direct you to complete a **Return-to-Compliance (RTC) Plan**, which is located on last page of the Self-Audit Forms. Use the RTC Plan to explain how and when you will return to compliance with the requirement. Only submit an RTC Plan for violations that you are unable to correct BEFORE submitting your self-audit. If you have questions about a requirement contact your Dry Cleaning Inspector or the Environmental Assistance Program at (800) 662-9278.

Step 5: Mail the completed 9-page Self-Audit Forms and any RTC Plans to the Michigan Department of Environmental Quality using the self-addressed envelope that was included in the audit package. You do not have to mail the forms if you complete the electronic version of the self-audit and are e-mailing it to the MDEQ.

RETURN ALL PAGES OF THIS FORM TO THE MDEQ

Self-Audit Forms for Dry Cleaning

Michigan Department of Environmental Quality, Environmental Results Program • (800) 662-9278 • www.michigan.gov/deg

Facility Name _____

Facility Address _____

City _____ State _____ Zip _____

Phone Number _____

Contact Name _____

Audit Date ____/____/____

Establishment Number									
Enter your establishment number in the boxes and print it at the bottom of the form (page 9)									
01	02	03	04	05	06	07	08	09	10
11	12	13	14	15	16	17	18	19	20
21	22	23	24	25	26	27	28	29	30
31	32	33	34	35	36	37	38	39	40
41	42	43	44	45	46	47	48	49	50
51	52	53	54	55	56	57	58	59	60
61	62	63	64	65	66	67	68	69	70
71	72	73	74	75	76	77	78	79	80
81	82	83	84	85	86	87	88	89	90
91	92	93	94	95	96	97	98	99	00

INSTRUCTIONS

1. Enter your facility information in the fields above as shown in the example to the right. Be sure to darken the appropriate box beneath each number. Your establishment number is printed on your dry cleaning license issued by the DEQ.
2. Complete the audit starting on the next page. Answer every question unless you are directed to skip it. Be sure to either put an "X" in the box that is your answer or darken the box completely.
3. Some answers may require you to complete a Return-to-Compliance (RTC) Plan. This means that you are not complying with the requirements and must complete a RTC Plan located at the back of this audit. Use this plan to explain how you will return to compliance. The completed RTC plan(s) should be submitted with the completed audit.
4. Return all nine pages of the self-audit and any RTC plans to the MDEQ using the self-addressed mailer envelope included in the audit package you received. If you are completing an electronic version of the audit, e-mail the completed forms to sdawne@michigan.gov.

* If you have questions please contact the Michigan Environmental Compliance Assistance Program 800.662.9278 *

DEQ Michigan Department of Environmental Quality
David C. Chapman, Director

ECP 8889 (03/07)

Figure 1: Self-Audit Forms

PART 1

Perchloroethylene Machine

Perchloroethylene (perc) dry cleaning machines have the potential to emit air contaminants. This part of the self-audit addresses the requirements that apply to your perc dry cleaning machine. Use the Self-Audit Forms that came with this workbook to record your answers. If you do not have a dry cleaning machine that uses perc skip to Part 2 starting on page 5. If you have more than one perc machine answer the audit questions as it relates to all your machines. For example, if you have two machines and you have repair logs for machine 1 but not for machine 2 then you would answer “No” to question 1.10 and complete a Return-to-Compliance (RTC) Plan.



General Requirements for All Perc Dry Cleaning Machines

In addition to the requirements identified in the questions below, it is important that you make sure your machine meets all local requirements. It is recommended, and sometimes required locally, that you install a backflow preventor on the potable water supply line connected to the machine. A backflow preventor can be installed by a licensed plumber and will protect your facility’s water supply from being contaminated with perc should a malfunction occur that would cause perc contaminated water to back up into the potable water supply.

Due to recent changes in federal regulations, perc dry cleaning machines are now subject to several new requirements. These new requirements are noted with a **New** tab next to the question (for example see question 1.8 and 1.15). If your machine was installed before December 21, 2005, you must comply with some of these new requirements by July 28, 2008. If your machine was installed after December 21, 2005 you must comply with these requirements immediately upon startup.

✓ AUDIT QUESTIONS (record answers on Dry Cleaning Facility Self-Audit Form)		
1.1. Is the Machine operated according to manufacturers’ specifications?	<input type="checkbox"/> Yes	<input type="checkbox"/> No Complete RTC
1.2. Are machine operating manuals kept on site?	<input type="checkbox"/> Yes	<input type="checkbox"/> No Complete RTC
1.3. Is the dry cleaning machine door kept closed, except for loading and unloading?	<input type="checkbox"/> Yes	<input type="checkbox"/> No Complete RTC
1.4. Do you keep a log of the gallons of perc purchased each month?	<input type="checkbox"/> Yes	<input type="checkbox"/> No Complete RTC
1.5. Are all perc purchase logs kept on file for five years?	<input type="checkbox"/> Yes	<input type="checkbox"/> No Complete RTC
1.6. Are all cartridge filters drained 24 hours before removal?	<input type="checkbox"/> Yes	<input type="checkbox"/> No Complete RTC

- Audit questions continued on the next page -

The form used to complete a Return-to-Compliance (RTC) Plan can be found at the end of the Self-Audit forms.

✓ AUDIT QUESTIONS (continued)		
1.7.	Are the following components of the machine inspected weekly/bi-weekly* for leaks? <ul style="list-style-type: none"> • All hose and pipe connections, fittings, couplings, and valves • Door gaskets • Filter gaskets • Pumps • Solvent tanks and containers • Muck cookers, stills • Water separator • Exhaust dampers • Diverter valves • Cartridge filter housing 	<input type="checkbox"/> Yes <input type="checkbox"/> No Complete RTC
New	1.8.	Is the machine inspected monthly while in operation with a halogenated hydrocarbon detector? <input type="checkbox"/> Yes <input type="checkbox"/> No
	1.9.	If a leak is detected, is it repaired in 24 hours or if it cannot be repaired in 24 hours are parts ordered within 2 working days and installed within 5 days of receiving them? <input type="checkbox"/> Yes <input type="checkbox"/> No Complete RTC
	1.10.	Do you keep a log of the date of any necessary repairs made to the machine? <input type="checkbox"/> Yes <input type="checkbox"/> No Complete RTC
	1.11.	Do you keep a log of machine inspections that identifies any components that are leaking? <input type="checkbox"/> Yes <input type="checkbox"/> No Complete RTC

* Inspection required biweekly if machine installed prior to 12/9/91 and purchase less than 140 gal perc per 12-month period.

Dry-to-Dry Machine Control Requirements

The following control requirements apply to all new small and large sources and all existing large sources. The requirements you are subject to depend on the amount of perc you purchase and the installation date of your machine (see footnotes at bottom of this page). Questions 1.12 through 1.30 pertain to the specific requirements that your dry cleaning machine may be subject to.

✓ AUDIT QUESTIONS (record answers on Dry Cleaning Facility Self-Audit Form)		
1.12.	Was the dry-to-dry machine installed <u>before</u> 12/9/91 AND did facility purchase <u>less</u> than 140 gallons of perc per year during all previous 12-month periods? ¹	<input type="checkbox"/> Yes <input type="checkbox"/> No Skip to 1.31
1.13.	Do all dry-to-dry machines installed <u>before</u> 12/9/91 have an external refrigerated condenser <u>OR</u> a carbon adsorber that was installed prior to 9/22/93? (Choose N/A if machine installed after 12/9/91) ²	<input type="checkbox"/> Yes <input type="checkbox"/> No Complete RTC <input type="checkbox"/> N/A
1.14.	Do all dry-to-dry machines installed after 12/9/91 have an internal refrigerated condenser? (Choose N/A if machine installed before 12/9/91) ³	<input type="checkbox"/> Yes <input type="checkbox"/> No Complete RTC <input type="checkbox"/> N/A

1. If machine was installed before 12/9/91 and you purchased less than 140 gallons of perc per year for all 12-month periods, you are considered an **existing small area source** and not required to have controls on the machine.
2. If machine was installed before 12/9/91 and you purchased more than 140 gallons of perc per year for all 12-month periods you are considered an **existing large area source** and required to have the controls identified in question 1.13.
3. If machine was installed after 12/9/91 you are considered a **new area source** and required to have the controls identified in question 1.14.

- Audit questions continued on the next page -

✓ AUDIT QUESTIONS (continued)

New	1.15. Do all dry-to-dry machines initially installed after 12/21/05 have an internal carbon adsorber AND refrigerated condenser? (Choose N/A if machine installed before 12/21/05) ⁴	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
New	1.16. If machine was installed after 12/21/05 OR facility purchased more than 2,100 gallons of perc per 12-month period, is the concentration of the perc in the dry cleaning <u>machine drum</u> at the end of the cycle measured weekly with a colorimetric detector tube or PCE gas analyzer? (Choose N/A if machine installed before 12/21/05 and purchased less than 2,100 gal perc/12-mo period)	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A Skip to 1.18
New	1.17. Is the concentration of perc less than 300 ppm?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	1.18. Are the external refrigerated condensers on a vented machine routed properly so that the air-perc stream is not vented directly to atmosphere while drum is rotating? (Choose N/A if machine has no refrigerated condenser or is a non vented machine)	<input type="checkbox"/> Yes	<input type="checkbox"/> No Complete RTC	<input type="checkbox"/> N/A
	1.19. Is the outlet temperature of the vapor stream passing through the cooling coil (refrigerated condenser) read weekly and is it equal to or less than 45° F (±2° F) or 7.2° C (±1.1° C)? (Choose N/A if reading pressure gauge to comply, see question 1.20)	<input type="checkbox"/> Yes	<input type="checkbox"/> No Complete RTC	<input type="checkbox"/> N/A
New	1.20. Are the high and low pressures of the refrigeration system read and recorded on a weekly basis? (Choose N/A if no pressure gauges)	<input type="checkbox"/> Yes	<input type="checkbox"/> No Complete RTC	<input type="checkbox"/> N/A
New	1.21. Are the pressures within those specified by the manufacturer? (Choose N/A if no pressure gauges)	<input type="checkbox"/> Yes	<input type="checkbox"/> No Complete RTC	<input type="checkbox"/> N/A
	1.22. Is the date, temperature sensor or pressure gauge monitoring results recorded weekly?	<input type="checkbox"/> Yes	<input type="checkbox"/> No Complete RTC	
	1.23. Is the date, temperature sensor or pressure gauge monitoring results kept on file for five years?	<input type="checkbox"/> Yes	<input type="checkbox"/> No Complete RTC	
	1.24. Is machine equipped with an external carbon adsorber? Note: If you don't know if your machine has a carbon adsorber, contact the machine manufacturer or your MDEQ Dry Cleaning Inspector.	<input type="checkbox"/> Yes	<input type="checkbox"/> No Skip to 1.30	
	1.25. If an external carbon adsorber is installed on a vented machine, is <u>none</u> of the air-perchloroethylene gas-vapor stream allowed to bypass the carbon adsorber to the atmosphere?	<input type="checkbox"/> Yes	<input type="checkbox"/> No Complete RTC	
	1.26. Is the concentration of perc in the exhaust of the external carbon adsorber measured <u>weekly</u> using a colorimetric detector tube or PCE gas analyzer?	<input type="checkbox"/> Yes	<input type="checkbox"/> No Complete RTC	

- Audit questions continued on the next page -

✓ AUDIT QUESTIONS (continued)		
1.27. Is the concentration of perc in the exhaust of the external carbon adsorber less than 100 parts per million per volume?	<input type="checkbox"/> Yes	<input type="checkbox"/> No Complete RTC
1.28. Are the date and colorimetric detector tube monitoring results recorded weekly?	<input type="checkbox"/> Yes	<input type="checkbox"/> No Complete RTC
1.29. Are the date and colorimetric detector tube monitoring results kept on file for 5 years?	<input type="checkbox"/> Yes	<input type="checkbox"/> No Complete RTC
1.30. Are necessary repairs made to the refrigerated condenser and/or carbon adsorber?	<input type="checkbox"/> Yes	<input type="checkbox"/> No Complete RTC

Notification Requirement

All perchloroethylene dry cleaning facilities are required to submit a Notification of Compliance Status to the MDEQ by **July 28, 2008**. This form is required under revised federal regulations that went into effect in July of 2006. The form can be accessed at www.michigan.gov/deqair (select "Compliance," then "Michigan Dry Cleaning Program").

✓ AUDIT QUESTIONS (record answers on Dry Cleaning Facility Self-Audit Form)		
New	1.31. Was a Notification of Compliance Status Form submitted to the MDEQ?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<i>Note: This form must be submitted by 7/28/08 or immediately upon startup.</i>		

Fees and Licensing

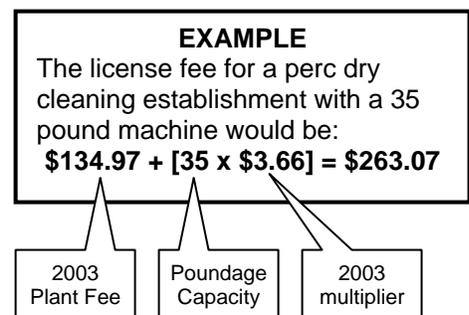
Air Quality Fee for Perc Dry Cleaners

The MDEQ's Air Quality Division has been given the authority to collect an annual air quality fee from certain businesses. **All Perchloroethylene Dry Cleaners must pay an annual Air Quality Fee.** The amount of the fee depends on whether the dry cleaning facility is a small, large, or major source. Source designations are based upon the amount of perchloroethylene purchased during any 12-month period.

Under this fee program, small and large area source dry cleaning facilities are subject to the requirements of this section and are required to pay an annual air quality fee. The Air Quality Division sends out the annual Air Quality Fee notice in January of each year. When a fee change is necessary, a fee is recommended by the DEQ and approved by the Michigan Legislature.

Licensing Fee for Perc Dry Cleaners

License fees for dry cleaners that use perc are determined by the total poundage capacity of the establishment's machines. There is a plant fee and a poundage fee which equals the license fee (see example). The license fees are increased annually based on the Detroit Consumer Price Index, but cannot be raised more than 5% per year.



PART 2

Petroleum Solvent Machine

If you don't have a machine that uses petroleum solvents answer "No" to question 2.1 and go to Part 3.

Petroleum dry-to-dry and transfer machines, and stills have the potential to discharge contaminants. This part of the self-audit addresses the requirements that apply to your petroleum solvent dry cleaning machine. Use the Self-Audit Forms to record your answers. Answer all questions unless directed to do otherwise.



✓ **AUDIT QUESTIONS** (record answers on Dry Cleaning Facility Self-Audit Form)

- 2.1. Does facility have a dry cleaning machine that uses a petroleum solvent? Yes No
Go to Part 3
- 2.2. Is the TOTAL manufacturers' rated dryer capacity for all dryers used for petroleum solvent equal to or greater than 84 pounds (38 kilograms)? Yes No
Go to Part 3
AND
Was the equipment installed after December 14, 1982?
- Manufacturer's rated dryer capacity is the dryer's (dry-to-dry machine's) rated capacity of articles, in pounds or kilograms of clothing articles per load, dry basis that is typically found on each dryer on the manufacturer's name-plate or in the manufacturer's equipment specifications. If the manufacturer's rated dryer capacity for all the dryers at the plant combined is equal to or greater than 84 pounds, then the source is subject to the requirements in this section.*
- 2.3. Is the filter a cartridge filter? Yes No
Complete RTC
- 2.4. Are cartridge filters drained in their sealed housings for at least eight hours prior to their removal? Yes No
Complete RTC
- 2.5. Is leak inspection and leak repair cycle information in the operating manual and on a clearly visible label posted on the dryer? Yes No
Complete RTC
- Note:** The manufacturer of the petroleum solvent dryer should have included leak inspection and leak repair cycle information in the operating manual and on a clearly visible label posted on the dryer.
- 2.6. Was the dryer installed between December 14, 1982 and September 21, 1984? Yes No
Skip to 2.8
- 2.7. Does facility use more than 4,700 gallons (17,791 liters) of solvent per year? Yes No
Go to Part 3
- 2.8. Is the dryer a solvent recovery dryer? Yes No
Complete RTC

- Audit questions continued on the next page -

✓ AUDIT QUESTIONS (continued)		
2.9. Was an initial performance test conducted to verify that the flow rate of recovered solvent from the solvent recovery dryer at the termination of the recovery cycle is no greater than 0.05 liters per minute? (See explanation below)	<input type="checkbox"/> Yes	<input type="checkbox"/> No Complete RTC
2.10. Does facility have a copy of the initial performance test?	<input type="checkbox"/> Yes	<input type="checkbox"/> No Complete RTC

Initial Performance Test

This test shall be conducted for a duration of no less than two weeks during which no less than 50 percent of the dry loads shall be monitored for their final recovered solvent flow rate. The suggested point for measuring the flow rate of recovered solvent is the outlet of the solvent-water separator. Near the end of the recovery cycle, the entire flow of recovered solvent should be diverted to a graduated cylinder. As the recovered solvent collects in the graduated cylinder, the elapsed time is monitored and recorded in periods of greater than or equal to one minute. At the same time, the volume of solvent in the graduated cylinder is monitored and recorded to determine the volume of recovered solvent that is collected during each time period. The recovered solvent flow rate is calculated by dividing the volume of solvent collected per period by the length of time elapsed during the period and converting the result with appropriate factors into units of liters per minute. The recovery cycle and the monitoring procedure should continue until the flow rate of solvent is less than or equal to 0.05 liter per minute. The type of articles cleaned and the total length of the cycle should then be recorded.

PART 3

Waste

Your legal responsibility as a generator of any quantity of waste extends from "cradle to grave." This covers the time from when the waste was first generated through its ultimate disposal. This part of the audit identifies requirements you must have in place before shipping certain waste offsite as well as the storage and disposal of your waste. Use the Self-Audit Forms to record your answers. Answer all questions unless directed to do otherwise.



Hazardous Waste

Following are common types of hazardous waste generated at a dry cleaning facility. Many of these can and should be recycled and/or reused.

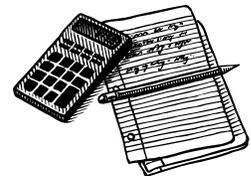
- Spent solvents, cooked powder residue (from PERC plants), still residues, and spent cartridge filters containing PERC and xylene.
- Stoddard solvent, isopropanol, naphtha, methyl isobutyl ketone, mineral spirits, still residues containing petroleum solvents, solvent-soaked rags, and oxidizers (e.g., bleach, nitrates, and peroxides)
- Caustics like alkaline cleaners and ammonia solutions (these are hazardous wastes because they may be corrosive).
- Waste aerosol cans that are not completely empty (aerosols like spot cleaners that are found at drycleaners can be hazardous due to the chlorinated solvents they contain or for ignitability. When discarded with unused contents, they are a hazardous waste).

These materials are NOT hazardous waste IF RECYCLED. If you do NOT recycle these wastes, they are considered to be a hazardous waste.

- **Contaminated shop towels, wipes, and rags (if laundered)**
- **Fluorescent/HID light bulbs**

How Much Hazardous Waste Do You Generate?

Before you can answer the audit questions in this part you will need to determine how much hazardous waste you generate each month. Facilities that generate less than 220 pounds of hazardous waste per month are considered "conditionally exempt small quantity generators" and subject to fewer requirements than those that generate more than 220 pounds.



You should be recording how many pounds of hazardous waste your facility generates each month. You can use the table below to enter how much waste is generated monthly or use a log sheet by the waste containers (see next page). You can use the hazardous waste worksheet on page 9 to help you estimate how many pounds of hazardous waste your facility generates in an average month. Once you determine how much hazardous waste you generate on a monthly basis you can answer audit question 3.1. **If you generate more than 220 pounds of hazardous waste per month you cannot use this part audit.**

Hazardous Waste Generated per Month		
January	_____	lbs.
February	_____	lbs.
March	_____	lbs.
April	_____	lbs.
May	_____	lbs.
June	_____	lbs.
July	_____	lbs.
August	_____	lbs.
September	_____	lbs.
October	_____	lbs.
November	_____	lbs.
December	_____	lbs.

Hazardous Waste Generated per Month (Example)		
January	<u>125</u>	lbs.
February	<u>125</u>	lbs.
March	<u>125</u>	lbs.
April	<u>180</u>	lbs.
May	<u>125</u>	lbs.
June	<u>75</u>	lbs.
July	<u>75</u>	lbs.
August	<u>100</u>	lbs.
September	<u>125</u>	lbs.
October	<u>125</u>	lbs.
November	<u>180</u>	lbs.
December	<u>125</u>	lbs.

Sample Waste Log

Waste Still Bottoms			
Date waste added:	How much added:	By:	Running monthly total
7/3/07	8 lbs	George G.	8 pounds
7/15/07	7 lbs	George G.	15 pounds
8/1/07	9 lbs	Sammy	9 lbs

Notice the new month's total

✓ AUDIT QUESTION (record answer on Dry Cleaning Facility Self-Audit Form)

3.1. Does your facility generate less than 220 pounds of hazardous waste per month? Yes No – **Skip to Part 4**
 You cannot use this part of the audit.

Note: The following worksheet provides only an approximation of the amount of waste you might generate. If you have a more accurate estimation you should use it to answer audit question 3.1.

HAZARDOUS WASTE WORKSHEET

Hazardous Waste		Monthly Generation		
		Gallons	lbs/gallon*	Pounds
Spent solvent <i>(do not include spent solvents that are reclaimed and returned to the dry cleaning process for reuse as long as the entire process is enclosed)</i>	<input type="checkbox"/> Spent Perc		x 13.5 =	
	<input type="checkbox"/> Spent Petroleum solvents (flash point <u>below</u> 140° F)**		x 7 =	
	<input type="checkbox"/> Other solvents (flash point <u>below</u> 140° F)**		x 8 =	
Unused products which are to be discarded	<input type="checkbox"/> Unused Perc		x 13.5 =	
	<input type="checkbox"/> Unused Petroleum solvents (flash point <u>below</u> 140° F)**		x 7 =	
	<input type="checkbox"/> Other unused <i>liquids</i> that are hazardous***		x 8 =	
	<input type="checkbox"/> Other unused <i>solids</i> that are hazardous			
Water contaminated with cleaning solvent that is stored on-site			x 8.4 =	
Spent filter cartridges (after draining 24 hours)				
Cooked powder residue				
Still residues from solvent distillation (solids)				
Solvent soaked rags or towels that are <u>not</u> being cleaned for reuse				
Fluorescent light tubes that are not being recycled.				
Other: see potential wastes listed on page 7				
Contaminated soils or other residue from spills or leaks				

* Multiply the number of gallons generated by this number to determine the number of pounds generated.

TOTAL:

--

**Solvents with a flash point above 140° F (e.g., Green Earth, Drylene 800, DR-2000, Rynex, Dry Solv) are not considered a hazardous waste if not mixed with other hazardous waste and should be managed as a liquid industrial waste. Contact your dry cleaning inspector for disposal requirements.

***Common examples include alkaline cleaners and ammonia solutions, other spot cleaners, including those in waste aerosol cans that are not completely empty.

HAZARDOUS WASTE WORKSHEET EXAMPLE

Hazardous Waste		Monthly Generation		
		Gallons	lbs/gallon*	Pounds
Spent solvent <i>(do not include spent solvents that are reclaimed and returned to the dry cleaning process for reuse as long as the entire process is enclosed)</i>	<input type="checkbox"/> Spent Perc	7	x 13.5 =	94.5
	<input type="checkbox"/> Spent Petroleum solvents (flash point <u>below</u> 140° F)**		x 7 =	
	<input type="checkbox"/> Other solvents (flash point <u>below</u> 140° F)**		x 8 =	
Unused products which are to be discarded	<input type="checkbox"/> Unused Perc		x 13.5 =	
	<input type="checkbox"/> Unused Petroleum solvents (flash point <u>below</u> 140° F)**		x 7 =	
	<input type="checkbox"/> Other unused <i>liquids</i> that are hazardous		x 8 =	
	<input type="checkbox"/> Other unused <i>solids</i> that are hazardous			
Water contaminated with cleaning solvent that is stored on-site			x 8.4 =	
Spent filter cartridges (after draining 24 hours)				10
Cooked powder residue				5
Still residues from solvent distillation (solids)				10
Solvent soaked rags or towels that are <u>not</u> being cleaned for reuse				
Fluorescent light tubes that are not being recycled.				
Other: see potential wastes listed on page 7				
Contaminated soils or other residue from spills or leaks				

* Multiply the number of gallons generated by this number to determine the number of pounds generated.

TOTAL:

119.5

**Solvents with a flash point above 140° F (e.g., Green Earth, Drylene 800, DR-2000, Rynex, Dry Solv) are not considered a hazardous waste if not mixed with other hazardous waste and should be managed as a liquid industrial waste. Contact your dry cleaning inspector for disposal requirements.

***Common examples include alkaline cleaners and ammonia solutions, other spot cleaners, including those in waste aerosol cans that are not completely empty.

This is how much hazardous waste was generated in the month.

Site Identification Number

Facilities that ship hazardous and liquid industrial wastes off-site on a manifest must obtain a unique site identification number. The number is used on the shipping manifests given to you by your waste hauler (see the discussion in the next section). Your site identification number will begin with one of the following prefixes: MIK, MIR, MID, MIT, MIE, MIO, or MIG. A new site identification number is required every time the owner of the facility changes or if the facility moves to a different location. If you have questions pertaining to using an existing site identification number, contact your WHMD district office (Appendix A) or you may look up your site identification number using the “Waste Data System (WDS)” at www.deq.state.mi.us/wdspj.

You can obtain a site identification number on-line at www.michigan.gov/mitaps (select “Apply for Permits”) or you may download the blank form and directions at www.deq.state.mi.us/deqforms (search for EQP 5150) and then mail the form and payment to the MDEQ address on the form. There is a fee to obtain a number. If you need help with applying for a number, contact the MDEQ at (800) 662-9278.

✓ AUDIT QUESTION (record answer on Dry Cleaning Facility Self-Audit Form)

- 3.2. Does your facility have a site identification number when needed for waste shipment? *(Choose N/A if you do not ship waste off-site)* Yes No N/A
Complete RTC **Skip to 3.7**
- Tip: The Site ID should appear on all Uniform Hazardous Waste Manifests with MIK, MIR, MID MIT, MIE, MIO, or MIG prefix.

Manifests and Shipping Records

Manifest forms are designed to track hazardous and liquid industrial waste shipments from their point of generation to their final destination. You should either have a manifest or the following records for each shipment of hazardous or liquid industrial waste that is hauled away from your facility. If your waste hauler does not provide a copy of the manifest it may be collected under a consolidated manifest, in which case they should provide you with a receipt that lists the following:

- Name and address of the dry cleaning facility and the facility where the waste is being taken.
- Amount of waste shipped off-site.
- Date of pick up
- The consolidated manifest number being used by the transporter.

The audit questions below pertain to the manifest requirements. If you have questions about manifests, contact the MDEQ at (800) 662-9278.

✓ AUDIT QUESTIONS (record answers on Dry Cleaning Facility Self-Audit Form)

- 3.3. Does each shipment of hazardous waste or liquid industrial waste have a manifest or receipt from the waste hauler that identifies manifest number and the type and quantity of waste shipped? Yes No
Complete RTC
- 3.4. Is the waste properly listed on the manifest form (e.g., F002) and is the quantity shipped entered on the manifest form? Yes No
Complete RTC
- 3.5. Has a copy of each manifest been signed by the waste hauler and submitted to the Michigan Department of Environmental Quality’s Waste and Hazardous Materials Division by the 10th of the month following the shipment? Yes No
Complete RTC
- 3.6. Are all copies of the manifest that are signed by the hauler and disposal facility kept on file for at least 3 years? Yes No
Complete RTC

Hazardous Waste Storage

Hazardous waste is commonly stored in portable containers such as pails or 55 gallon drums. The proper storage and labeling of waste helps prevent mismanagement. It is a good idea to put one person in charge of making sure the wastes are correctly identified, labeled, and stored. Labeling also helps to protect the workers. If the contents of drums are not known, the chances of a worker being exposed to hazards or being injured are increased. An explosion could occur if wastes that are incompatible are mixed with unknown wastes in a drum. Questions 3.7 through 3.20 pertain to the storage and labeling requirements.



✓ AUDIT QUESTIONS (record answers on Dry Cleaning Facility Self-Audit Form)		
3.7. Is each storage container labeled with the name of the contents (e.g., perc waste, filters) and is the label readable? (See Figure 3.1 on page 13). <i>Container may be labeled using purchased labels, a stencil, or the completed shipping label.</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No* Recommended
3.8. Is each container that is being shipped labeled according to the US DOT Shipping requirements? (E.g. does it have a completed US DOT shipping label as shown in Figure 3.2 on page 13?) <i>Your hazardous waste hauler should be able to assist you with properly labeling the containers for transport. Contact the Michigan State Police, Motor Carrier Division at (517) 336-6580 for additional transportation requirements.</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No Complete RTC
3.9. Is less than 2,200 pounds (5 drums) of hazardous waste accumulated on site?	<input type="checkbox"/> Yes	<input type="checkbox"/> No Complete RTC
3.10. Are containers in good condition and kept closed except when adding or removing waste?	<input type="checkbox"/> Yes	<input type="checkbox"/> No Complete RTC
3.11. Is the exterior of the storage containers kept free of the liquid waste and its residue?	<input type="checkbox"/> Yes	<input type="checkbox"/> No Complete RTC
3.12. Are containers protected from the weather? If storing containers outdoors, they are placed on an impervious surface and protected from the elements.	<input type="checkbox"/> Yes	<input type="checkbox"/> No Complete RTC
3.13. Are containers protected from fire and secure from vandalism and physical damage such as that caused by fork lifts or other equipment?	<input type="checkbox"/> Yes	<input type="checkbox"/> No Complete RTC
3.14. Are the containers compatible with the type of waste being stored in them and are containers that have wastes that could react with each other separated by a physical barrier, like a dike, berm, or wall, or by a safe distance?	<input type="checkbox"/> Yes	<input type="checkbox"/> No Complete RTC
3.15. Is there adequate aisle space for unobstructed movement of emergency equipment and personnel?	<input type="checkbox"/> Yes	<input type="checkbox"/> No* Recommended

* Required if facility generates more than 220 lbs of hazardous per month. Facilities generating more than 220 lbs of hazardous waste per month should not be completing this part of the audit (see page 8).

- Audit questions continued on the next page -

✓ AUDIT QUESTIONS (continued)		
3.16. If contents have a flashpoint below 200° F, are they isolated according to local fire department recommendations?	<input type="checkbox"/> Yes	<input type="checkbox"/> No Complete RTC
3.17. If a leak or spill occurs do you immediately stop and contain the leak and repair or replace the container?	<input type="checkbox"/> Yes	<input type="checkbox"/> No Complete RTC
3.18. Have employees been trained on how to properly manage waste?	<input type="checkbox"/> Yes	<input type="checkbox"/> No** Recommended
3.19. Does hazardous waste storage area have secondary containment such as a curb, ramped pad, dike, or containment room?	<input type="checkbox"/> Yes	<input type="checkbox"/> No** Recommended
3.20. Are you doing any of the best management practices listed in Table 3.1?	<input type="checkbox"/> Yes	<input type="checkbox"/> No** Recommended

**Questions 3.18 through 3.20 pertain to best management practices that are not required but recommended.

TABLE 3.1: BEST MANAGEMENT PRACTICES – NOT REQUIRED BUT RECOMMENDED
<input type="checkbox"/> All containers are checked at least once a week to ensure that they are not leaking or rusting and that they have no bulges. You should also check to see how much waste is stored in your containers to make sure you do not exceed the 2,200 lbs (5 drum) limit.
<input type="checkbox"/> Caution is taken when opening, handling, or storing containers to avoid rupturing the containers or causing them to leak or spill.
<input type="checkbox"/> A spill control kit and equipment is maintained near stored fluids.
<input type="checkbox"/> Tight fitting lids, leak-proof spigots, funnels, or pumps are used to transfer fluids.
<input type="checkbox"/> Drips and spills are prevented by: <ul style="list-style-type: none"> • Using drip pans or trays to collect drips and spills where fluids are transferred. • Draining and collecting fluids on a covered, curbed, and sealed concrete area away from any drains. • Using dedicated equipment, such as drain pans or funnels, for oil-based waste streams to prevent cross-contamination with chlorinated solvent wastes.



Figure 3.1: Example of Hazardous Waste Storage Label

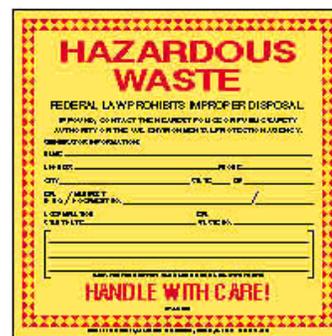


Figure 3.2: Hazardous Waste Shipping Label

Hazardous Waste Disposal

It is recommended that you use a hazardous waste disposal facility or recycle your waste. **Do not dump any of your liquid waste into the sewer system (sink, toilet, floor drain) unless you have been specifically authorized to do so, in writing, by your local wastewater treatment plant.** This is discussed in more detail in Part 5 of this audit. The questions below address the disposal of your hazardous waste.

✓ AUDIT QUESTIONS (record answers on Dry Cleaning Facility Self-Audit Form)		
3.21. Are hazardous wastes that are a <u>liquid</u> shipped to a licensed recycling, treatment, storage, or disposal facility?	<input type="checkbox"/> Yes	<input type="checkbox"/> No Complete RTC
3.22. Is your facility complying with the following requirements? <ul style="list-style-type: none">• <u>Liquid</u> hazardous wastes are never disposed of in a dumpster, solid waste landfill, or incinerator.• Waste is not put into the municipal sanitary sewer system (sink, toilet, floor drain) without authorization from local wastewater treatment plant.• Hazardous waste is not flushed into a septic tank, down a storm drain, into a stream, or on the ground.	<input type="checkbox"/> Yes	<input type="checkbox"/> No Complete RTC
3.23. Is your facility doing any of the following best management practices? <input type="checkbox"/> Hazardous wastes that are <u>solids</u> are disposed of in one of the following ways: <ul style="list-style-type: none">• shipped to a licensed recycling, treatment, storage, or disposal facility• taken to a household hazardous waste collection site that is willing to accept your hazardous waste. <input type="checkbox"/> " <u>Solid</u> " hazardous wastes are not disposed of in a solid waste landfill, municipal waste incinerator, or in a dumpster.	<input type="checkbox"/> Yes	<input type="checkbox"/> No Recommended*

*Question 3.23 pertains to best management practices that are not required but recommended.

Fluorescent Tubes, Lamps, and Batteries

You can handle your fluorescent tubes, incandescent lamps and dry cell batteries, as “universal waste” instead of hazardous waste. If you choose to manage your fluorescent tubes, incandescent lamps and dry cell batteries as a universal waste, you DO NOT include this quantity in the allowed 220 lbs per month hazardous waste (see page 8).

You can arrange for a recycling company to pick up universal waste from your business or you can ship them to a recycling facility. A hazardous waste manifest and the use of permitted and registered hazardous waste transporters are NOT required. Recyclers can be found in the Recycled Materials Market Directory at www.michigan.gov/degrmmd.

If you put fluorescent tubes, incandescent lamps, or dry cell batteries in the trash (dumpster) they must be included in the amount of hazardous waste you generate, which was discussed on page 8. You should also make sure they are accepted by your waste company.

✓ AUDIT QUESTIONS (record answers on Dry Cleaning Facility Self-Audit Form)

3.24. Does your facility recycle fluorescent tubes, incandescent lamps, and/or dry cell batteries?

Yes

No

Recommended
Skip to 3.27

Only put this waste in your trash (dumpster) with permission from waste hauler and/or landfill (Some haulers and landfills may no longer accept these wastes due to the lead and mercury contained in them.)

3.25. Are fluorescent tubes, incandescent lamps, dry cell batteries, stored for recycling according to the following requirements?

Yes

No

Complete RTC

- Stored not over one year after generation.
- Records are kept that show how long they have been stored using a method that clearly demonstrates how long they have been accumulated.
- Waste is labeled or the container holding the waste is labeled with the following: “universal waste electric lamps,” “waste electric lamps,” “used electric lamps,” or “universal waste batteries,” “waste batteries,” “used batteries.”
- Waste must be stored in a way that prevents any spills or releases. Containers must be kept closed, in good condition, and be compatible with the type of waste stored in the containers.
- No more than 11,000 pounds of these wastes can be accumulated at any one time.

3.26. Have employees who handle fluorescent tubes, incandescent lamps, and dry cell batteries, been Informed about proper handling of these waste materials and any emergency procedures?

Yes

No

Complete RTC

3.27. Does your facility do any of the following?

Yes

No

Recommended

- Recharge and use batteries that are still rechargeable.
- Use low-mercury, energy-efficient fluorescent/HID light bulbs.
- Keep recycling or disposal receipts for at least 3 years, and know who takes them to be recycled or disposed.

Solid Waste Requirements

Solid waste includes garbage, rubbish, industrial and commercial waste that is not a hazardous waste. Materials like cardboard, paper, hangers, metal, glass, and plastics can be recycled and/or reused. Recyclers can be found in the Recycled Materials Market Directory at www.michigan.gov/degrmmd. Removing these items from your trash can significantly lower solid waste disposal costs because your dumpster will not fill up as fast.



✓ AUDIT QUESTIONS (record answers on Dry Cleaning Facility Self-Audit Form)		
3.28. Is all <u>solid waste</u> hauled to a recycling center or a licensed disposal facility, which includes: a landfill, incinerator, or a transfer/processing facility?	<input type="checkbox"/> Yes	<input type="checkbox"/> No Complete RTC
3.29. Is waste stored in leak-proof, covered containers (e.g. covered dumpster)?	<input type="checkbox"/> Yes	<input type="checkbox"/> No Complete RTC
3.30. Does your facility recycle or reuse office paper, corrugated cardboard, wood pallets, 55-gallon clean drums, other containers, or scrap metal?	<input type="checkbox"/> Yes	<input type="checkbox"/> No Recommended

If you are uncertain if you have solid waste and its management requirements, contact the MDEQ's Environmental Assistance Center at (800) 662-9278.

PART 4

Storage Tanks

Aboveground storage tanks are sometimes used to store fuel, solvents, or other materials at a facility. This part of the audit includes questions that apply to storage tanks. Use the Self-Audit Forms to record your answers. Answer all questions unless directed to do otherwise.



✓ AUDIT QUESTIONS (record answers on Dry Cleaning Facility Self-Audit Form)

- | | | |
|--|------------------------------|--|
| 4.1. Does your facility store fuel, solvents, or other material in an aboveground storage tank? | <input type="checkbox"/> Yes | <input type="checkbox"/> No
Go to Part 5 |
| 4.2. Does the storage tank have secondary containment? | <input type="checkbox"/> Yes | <input type="checkbox"/> No
Complete RTC |
| 4.3. Is the tank any of the following?
<ul style="list-style-type: none"> • Used to supply flammable or combustible liquid with a storage capacity of more than 1,100 gallons. <i>This includes dry cleaning solvents and/or fuel oil.</i> • A flammable compressed gas or LPG container filling location. • 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"/> Yes | <input type="checkbox"/> No
Skip to 4.5 |
| 4.4. Has the tank been certified by the Michigan Department of Environmental Quality, Waste and Hazardous Materials Division? | <input type="checkbox"/> Yes | <input type="checkbox"/> No
Complete RTC |
| 4.5. Does the tank meet the requirements in Table 4.1? | <input type="checkbox"/> Yes | <input type="checkbox"/> No
Complete RTC |

TABLE 4.1: STORAGE TANK REQUIREMENTS

- A single- or double-bottom shop-manufactured tank that has an external mastic-coated bottom can only be installed on a concrete or asphalt pad that is higher than the surrounding dike floor.
- Cathodic protection that is properly engineered and maintained must be used for the exterior of single- or double-bottom tanks that are installed on earth and gravel.
- Cathodic protection can be used on single- or double-bottom tanks that are installed on a concrete or asphalt pad at the same level as the rest of the dike floor.
- Precautions must be taken to prevent the ignition of flammable vapors. Sources of ignition include but are not limited to: open flames, cutting and welding, thermal heat, spontaneous ignition, stray currents, smoking.
- The tank should be bonded or otherwise connected to the ground to prevent static electricity.
- Releases or suspected releases of a regulated substance from the storage tank must be reported. Emergency spills can be reported to the Pollution Emergency Alerting System at (800) 292-4706 and the local fire department. All other releases can be reported to the local DEQ district office. Some signs that a release has occurred are visibly stained soils, holes in the AST, and odoriferous soils.
- An emergency action plan must be available and made known to employees to respond to fire or other emergencies. (Alternate fire safety measures on-site must be in place while any fire safety equipment is shut down.) This emergency plan should be coordinated with your local emergency response agencies, such as fire, police, etc. In most cases, your local agencies will respond to your alarm or call.
- Note: After **August 13, 2008** all tanks must have spill, overfill, and corrosion protection.

PART 5

Facility Wastewater

The wastewater that comes from your dry cleaning activities is subject to requirements, which will depend on whether your facility is hooked up to the municipal sewer system, a septic system, or a holding tank. Sources of wastewater include:

- drycleaning machine
- separator water
- filter cleaning
- cooling water from your solvent condenser(s), still(s)
- compressor, boiler, or vacuum
- machine wash down
- laundry wash area



Questions 5.1 through 5.13 pertain to wastewater requirements. Prior to answering these questions you will need to identify the different areas where wastewater is generated and how you dispose of that wastewater. Use the Self-Audit Forms to record your answers. Answer all questions unless directed to do otherwise.

✓ AUDIT QUESTIONS (record answers on Dry Cleaning Facility Self-Audit Form)

- | | | | |
|------|---|------------------------------|---|
| 5.1. | Is your facility connected to a sewer system that goes to a wastewater treatment plant? | <input type="checkbox"/> Yes | <input type="checkbox"/> No
Skip to 5.6 |
| 5.2. | Does your facility empty wastewater from any dry cleaning machine into a drain, toilet, or sink? | <input type="checkbox"/> Yes | <input type="checkbox"/> No
Skip to 5.4 |
| 5.3. | Does your facility have permission from the wastewater treatment plant to dispose of wastewater from dry cleaning machine into the sewer system? (e.g., permit, letter, or written authorization from wastewater treatment plant) | <input type="checkbox"/> Yes | <input type="checkbox"/> No
Complete RTC |
| 5.4. | Does your facility empty wastewater from laundry area, air compressor, boiler, vacuum, or floor cleaning into a drain, toilet, or sink? | <input type="checkbox"/> Yes | <input type="checkbox"/> No
Skip to 5.6 |
| 5.5. | Does your facility have permission from the wastewater treatment plant to dispose of wastewater from laundry area, air compressor, boiler, vacuum, or floor cleaning into the sewer system? (e.g., permit, letter, or written authorization from wastewater treatment plant) | <input type="checkbox"/> Yes | <input type="checkbox"/> No
Complete RTC |
| 5.6. | Does your facility use an evaporator device to dispose of wastewater? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| 5.7. | Is any wastewater collected in a holding tank? | <input type="checkbox"/> Yes | <input type="checkbox"/> No
Skip to 5.9 |

- Audit questions continued on the next page -

Part 5: Facility Wastewater

✓ **AUDIT QUESTIONS (continued)**

- | | | |
|---|---|--|
| 5.8. Is wastewater that is collected in holding tank disposed of by a licensed and registered hauler? | <input type="checkbox"/> Yes | <input type="checkbox"/> No
Complete RTC |
| 5.9. Does any wastewater from your facility go to a septic system? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| 5.10. Does your facility empty wastewater from dry cleaning machine, laundry area, air compressor, boiler, vacuum, or floor cleaning onto the ground, storm sewer, steam, or ditch? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| 5.11. Are there any floor drains in facility? | <input type="checkbox"/> Yes | <input type="checkbox"/> No
Go to Part 6 |
| 5.12. Do they empty to a sewer system that goes to a wastewater treatment plant or a holding tank? | <input type="checkbox"/> Yes
Go to Part 6 | <input type="checkbox"/> No |
| 5.13. Have the drains that empty to a storm sewer, stream, or ditch been plugged with concrete or a locked down cement cap so that they are inaccessible and unusable? | <input type="checkbox"/> Yes | <input type="checkbox"/> No
Complete RTC |

PART 6

Safety Equipment

Portable Fire Extinguishers

Facilities with only perchloroethylene solvent machines are required to have a minimum of one fire extinguisher. Facilities with a petroleum solvent machine must have at least two portable fire extinguishers with at least a 2a,10bc rating and one of those extinguishers must be mounted near the dry cleaning machine.



Respirator

Your dry cleaning facility must have an approved organic vapor respirator.

The respirator must be:

- Kept near the dry cleaning machine in a sealed container
- Properly identified
- In good working condition
- Available for immediate use
- 2300 series organic vapor for perchloroethylene



The chemical specific cartridges for the respirators must be:

- Approved and used according to the manufacturers specifications
- Replaced immediately upon noticing an odor penetrating through the mask

✓ AUDIT QUESTIONS (record answers on Dry Cleaning Facility Self-Audit Form)

- | | | |
|---|------------------------------|---|
| 6.1. Are there at least two portable fire extinguishers (or one extinguisher for perc dry cleaning facilities) with at least a 2a,10bc rating at the facility and is one of those fire extinguishers mounted near the dry cleaning machine? | <input type="checkbox"/> Yes | <input type="checkbox"/> No
Complete RTC |
| 6.2. Does facility have an approved organic vapor respirator? | <input type="checkbox"/> Yes | <input type="checkbox"/> No
Complete RTC |



This is the end of the Self-Audit.

Please mail the completed, nine-page Self-Audit Forms and any completed RTC Plans to the MDEQ in the self addressed envelope that was included with your audit packet.

If you are completing the electronic version of the Self-Audit forms please e-mail the Self-Audit Forms and any RTC Plans to ostrowsj@michigan.gov.

PART 7

Environmental Planning, Reporting, and Release Response

Please Note: This part of the workbook explains additional requirements that you should be aware of but are not included in the self-audit. You are encouraged to review these requirements.

Liquids such as Perchloroethylene can potentially be spilled and illegally allowed to run onto the ground, down drains, or evaporate. If this happens, it might cause serious harm to the environment and may possibly put you, your employees, and neighbors at risk. The reporting, planning, and response requirements identified in this part are used to protect public health and the environment from spills and releases that could occur at your business.

Pollution Incident Prevention Plan (PIPP)

A dry cleaning facility that manages 440 or more pounds of “polluting materials” outdoors or 2,200 or more pounds of polluting materials indoors is subject to the PIPP requirements. Perchloroethylene (also known as perc or tetrachloroethylene) is considered a “polluting material.” **For most dry cleaners, this would be approximately 32 gallons of perc stored outdoors or approximately 163 gallons of perc managed indoors.** It is necessary to include the amount of perc in the machines when calculating how much polluting materials are on-site. For example if your perc machine has three tanks that contain 75 gallons each (225 gallons perc) you will be subject to this requirement. Or, if your facility has two perc machines and each machine has two 50 gallon perc tanks (200 gallons perc) you will be subject to this requirement. You do not have to include the following when determining how much polluting materials are managed:

- Polluting materials that are managed in containers that individually do not exceed 10 gallons AND stored indoors with adequate safeguards to prevent a release.
- Polluting materials stored in an underground storage tank or aboveground storage tank that is in compliance with the requirements described in Chapter 4.

If you have questions about this requirement contact the MDEQ Environmental Assistance Center at 800-662-9278

A facility subject to this requirement must do the following:

- ✓ Develop a PIPP. An informational packet is available at www.michigan.gov/deqemergencyplan
- ✓ Review your PIPP every three years or after any release that required implementation of the plan.
- ✓ Send a notification that a PIPP was prepared to the following: The local emergency planning committee; the local health department; and the MDEQ, Water Bureau district office. A certification stating the facility is in compliance with all the Part 5 rules must also be submitted to the DEQ. If a PIPP was updated, you only have to renotify and recertify compliance with the MDEQ.
- ✓ Meet secondary containment and release reporting requirements.

There is not a specific form required for use when submitting the notification or certification. It is recommended you identify what polluting materials are on-site in your notification. This may help determine if any of these entities would want to request a copy of the facility PIPP. A facility must submit a copy of the plan within 30 days of receiving the request.

Release Reporting Requirements

It is extremely important that you know who to contact should a spill/release occur at your facility. Use Table 7.1 on the next page to identify who you should contact and when. This information should also be in your PIPP if you are required to have one.

- If in doubt about whether or not a release should be reported, it is recommended that you report it to the
 - DEQ Pollution Emergency Alerting System (PEAS) at **(800) 292-4706**,
 - National Response Center at **(800) 424-8802**, and
 - **911**.

Report the release immediately (within 15 minutes).

Some spills/releases require that a follow-up written report be completed. You can find information about these report forms as well as a detailed Release Notification Requirements table on the internet at www.michigan.gov/degrelease.



TABLE 7.1: RELEASE REPORTING REQUIREMENTS

If the spill/release involves	Contact	Written Follow –Up Report*
Threat to public health or safety	<input type="checkbox"/> 911 or Fire Department <input type="checkbox"/> Local State Police Post <input type="checkbox"/> DEQ, Air Quality Division District Office (Appendix A)	Within 30 days submit written report to the DEQ Air Quality Division District Supervisor.
Unpermitted release of 7.4 gallons or more of perc	Within 15 minutes of discovery: <input type="checkbox"/> National Response Center 800-424-8802 <input type="checkbox"/> DEQ PEAS hotline 800-292-4706 <input type="checkbox"/> Local Emergency Planning Committee (LEPC) (if release affects those outside of property boundaries)	As soon as practicable after the release submit a written report to LEPC and Michigan SARA Title III Program. Find report at www.michigan.gov/deq (select “Assistance & Support Services,” Environmental Reporting,” then “Spill/Release Reporting”)
Unpermitted release of 0.74 gallons or more of perc, or any amount that causes unnatural turbidity, color, visible sheens, oil films, foams, solids, or deposits in water.	As soon as practicable: <input type="checkbox"/> DEQ PEAS hotline 800-292-4706 <input type="checkbox"/> 911	Within 10 days after release submit written report to: <input type="checkbox"/> DEQ, Water Bureau district supervisor outlining cause, discovery, response, and prevention of reoccurrence. <input type="checkbox"/> Local health department.
Any amount of substance from an underground storage tank (UST)	Within 24 hours: <input type="checkbox"/> DEQ PEAS hotline 800-292-4706	Contact DEQ, Remediation and Redevelopment Division for required reports 800-662-9278.
Any amount of petroleum solvent (Stoddard Solvent) that reaches navigable waters or shorelines that can affect water quality standards, or cause a film, sheen or discoloration, or could cause a sludge or emulsion, and it was not a permitted release.	<input type="checkbox"/> National Response Center 800-424-8802 <input type="checkbox"/> DEQ PEAS hotline 800-292-4706 <input type="checkbox"/> 911	Within 10 days after release submit written report to: <input type="checkbox"/> DEQ, Water Bureau district supervisor outlining cause, discovery, response, and prevention of reoccurrence. <input type="checkbox"/> Local health department.
Hazardous waste release that reaches groundwater or that could threaten human health or environment	Immediate to: <input type="checkbox"/> DEQ PEAS hotline 800-292-4706 <input type="checkbox"/> National Response Center 800-424-8802	Only large quantity generators of hazardous waste must submit report. For information call 800-662-9278.
One death or the hospitalization of three or more persons	Within 8 hours: <input type="checkbox"/> MIOSHA hotline 800-858-0397	

* The MDEQ Spill or Release Report Form (EQP 3465) can be used to submit a written report. This form can be accessed at www.michigan.gov/degrelease (select “Release Reporting Forms”).

Release Response and Cleanup

Responding to and cleaning up a spill can be expensive and detrimental to the health of your employees and environment. Make it a priority to integrate pollution prevention activities into all aspects of your operations, including the prevention of spills.

You must be ready to immediately respond whenever a release occurs. Whether you are legally required to prepare an environmental release prevention and response plan or voluntarily decide to prepare one, it needs to be in effect with personnel who are adequately trained to implement it. This helps to ensure that when a release occurs, appropriate response is taken without delay. At least one person trained in release control and cleanup procedures, equipment use, and disposal methods of recovered materials should be on duty or on call at all times. It is important to remember that you are obligated to respond and clean up all contamination. Failure to do so may result in escalated enforcement, including but not limited to the imposition of civil penalties.



All response actions to releases of materials should encompass the following concerns:

1. Immediately assess the type of release and take appropriate response measures to protect the health and safety of those in the affected area, when and where possible.
2. Quickly contain the release to prevent the spread of contamination. For example, cover floor drains to prevent the release from reaching the sewer and dike the release with absorbents such as spill pillows or cat litter and dirt, if necessary, to prevent it from spreading. Staff responding to the release must be trained and wearing the appropriate personal safety equipment. Most facilities managing materials are required to have an environmental release prevention and response plan in the event of a release. These plans need to be practical, efficient, and provide useful instructions to facility personnel that can be easily followed to clean up a release.
3. Clean up the contamination to prevent further damage(s) to human health and the environment. Release prevention, planning, rapid containment, response, and cleanup may minimize the environmental impact(s) as well as decrease your overall cost of cleanup. This can be as simple as sweeping up an absorbent used to contain a release, or as complex as purging and treating groundwater for years under an approved state remedial action plan or state/federal enforcement order. Waste generated from a cleanup must be properly characterized, managed, and disposed of in accordance with the applicable state and federal requirements. Most importantly, communicate with the environmental regulatory agencies in your area. DEQ staff can provide additional guidance to help assure your response is appropriate and cost-effective.

Some released substances and cleanup materials may pose a health threat to personnel. Have appropriate personal protection equipment (PPE) available and personnel trained in its proper use. Depending on the hazardous nature of the release, PPE may include the appropriate chemical resistant suits, gloves, boots, respirators, self-contained breathing apparatus, and eye protection such as goggles or face shields. MSDSs or the NIOSH Pocket Guide to Chemical Hazards' web sites at www.cdc.gov/niosh/homepage.html and <http://hazmat.dot.gov/guidebook.htm> contain valuable information for selecting the appropriate PPE. Persons responding to hazardous releases must be trained in accordance with the Hazardous Waste Operations and Emergency Response (HAZWOPER) procedures. Another option is to procure professional assistance. Look under the headings "Environmental and Ecological Services," "Spill Control Service," or "Waste Reduction, Disposal, and Recycling Service" in the yellow pages of your telephone directory for companies offering environmental cleanup services in your area.

Part 7: Environmental Planning, Reporting, and Release Response

Commercial spill kits are available to help contain releases, or you may assemble equipment specific to your company's needs based on release planning. Many products are used to contain and clean up released materials. Absorbent pads, booms, or portable dikes are often used for large liquid releases. Commercially available absorbent powders and granular clay (like cat litter) are examples of items used to absorb and contain small amounts of released liquids.



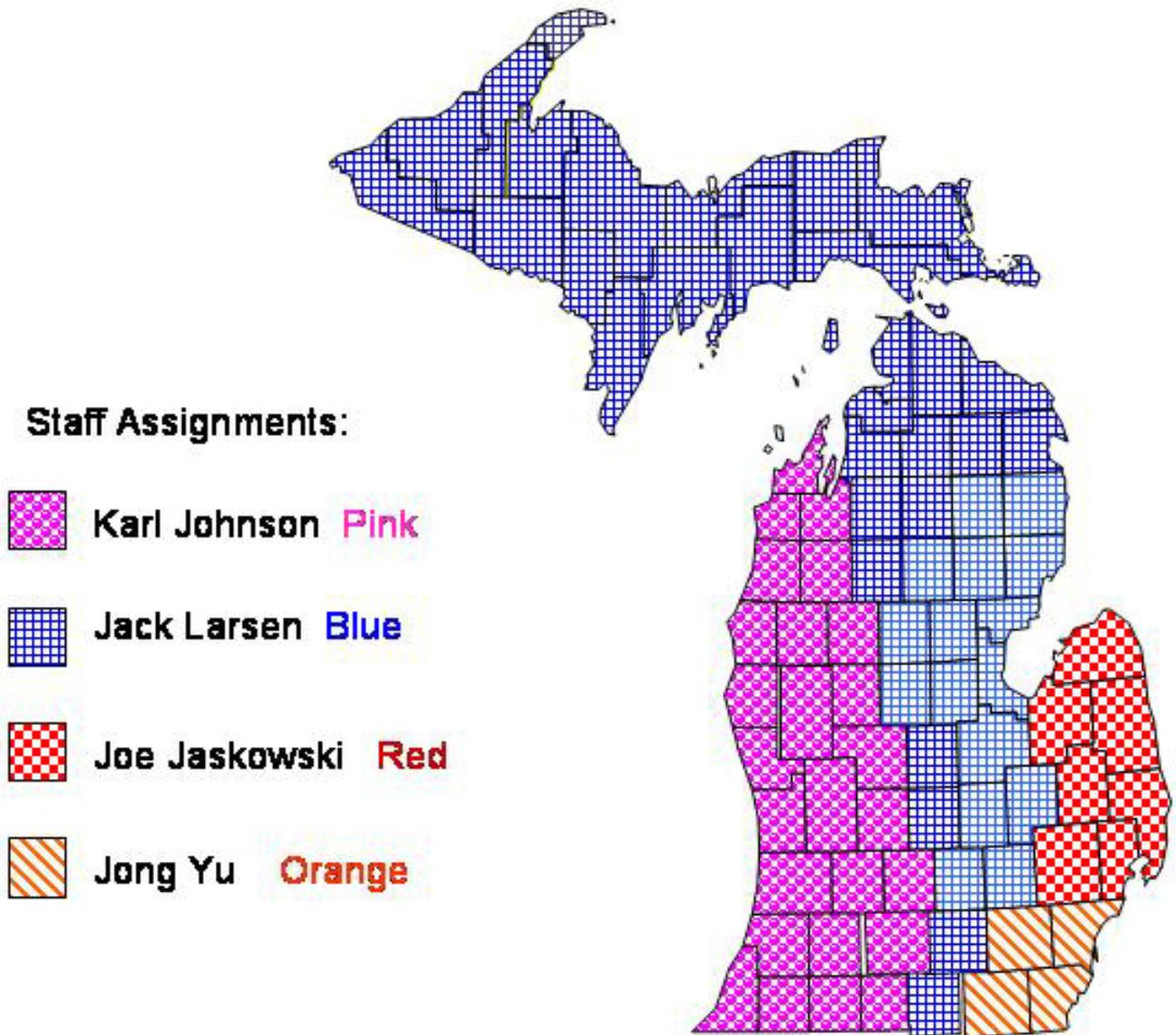
Be very careful not to mix incompatible or reactive wastes together. Containers used to store spent cleanup materials must be kept closed and labeled.

Remember that the container must be resistant to the absorbed chemicals. If the container is not compatible with the released liquid, the container could dissolve, which could result in a bigger cleanup problem. Once contained, the used cleanup materials must be properly disposed of based on the hazardous characteristics of your waste. Make sure there is no free liquid present with the spent absorbent material, if the used materials are going to a sanitary landfill. If liquid is present, the absorbent material cannot be sent to a sanitary landfill for disposal. Be aware that waste from cleanup activities often totals more than 220 lbs during a calendar month, which means your generator status may change. Generating more than 220 lbs of hazardous waste per month makes your establishment subject to additional regulations (see page 8). Contaminated soils and residues from perc cleanups normally would be listed hazardous waste. Your cleanup company usually helps you characterize the waste generated.

For more information about response procedures and waste characterization, contact your MDEQ district office (see Appendix A). MDEQ district office staff can verify that your state reporting obligation(s) have been satisfied and that your cleanup is being conducted properly.

If a release cannot be cleaned up by your trained personnel, consider hiring an experienced environmental cleanup contractor. A contractor may provide cost effective response solutions in a more efficient and effective manner.

Appendix A: MDEQ Dry Cleaning Program Districts



Staff Assignments:

-  **Karl Johnson** Pink
-  **Jack Larsen** Blue
-  **Joe Jaskowski** Red
-  **Jong Yu** Orange

Contact Information

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