



Small Business & Local Government Assistance Dry Cleaners Compliance Checklist

Company Information	__1 st visit	__2 nd visit	__3 rd visit	__Other	Site Visit Date: _____
Company Name			Facility Contact		
Mailing Address			Physical Address		
			County		
Owner's Name			Business Phone		
Date of Construction			Primary SIC		
Start of Operation			Secondary SIC		
Latitude			Longitude		

IMPORTANT NOTE: Compliance related questions are denoted with a checkmark (✓). Answering “no” to a question with a checkmark may mean the facility is out of compliance with state or federal environmental rules.

Air Regulations – Authorizations can be obtained in one of three ways:

- Permit by Rule (pbr)
- Standard Permit
- New Source Review (NSR) Permit

		Yes	No	N/A
1	Does this facility have an air account number? If yes, Account No. _____			
2✓	Does this facility have an air permit? If yes, Permit No. _____			
3✓	If yes: Does the facility comply with all permit conditions? (Use comments section)			
4✓	Does the facility claim a permit by Rule (PBR)?			
5	If yes, Does the facility meet all requirements of the PBR(s) claimed? See Below			
	✓ <input type="checkbox"/> 106.411 – Steam or Dry Cleaning Equipment			
	✓ <input type="checkbox"/> 106.415 – Laundry Dryers			
	✓ <input type="checkbox"/> Other/Previous PBR: _____			
	✓ <input type="checkbox"/> Other/Previous PBR: _____			
	✓ <input type="checkbox"/> Other/Previous PBR: _____			
6✓	Does the facility maintain records that demonstrate compliance as required by 30 TAC 106.8 for all PBRs?			
7✓	Does the facility avoid being a nuisance (noise, dust, odor, etc)?			
Air Regulations (Federal Requirements)		Yes	No	N/A
8	Does the New source Performance Standard (NSPS) for Petroleum Dry Cleaners apply to this facility?			
9	If yes,			
	a. ✓ Are solvent recovery dryers used?			
	b. ✓ Are cartridge filters used and drained their sealed housing for at least eight hours before removal?			
	c. ✓ Does each dryer have a manufacturer's label regarding leaks and inspections?			
	d. ✓ Has the initial test of each dryer been conducted and properly documented?			
10	Do the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for perchloroethylene dry cleaning facilities apply to this facility?			
11	If yes,			
	a. ✓ Is each perc machine registered with the EPA?			
	b. ✓ Has the proper solvent recovery control device been installed on each perc machine? (The type of device required depends on the solvent purchases)			

	c. ✓ Are the machines maintained, leaks, checked, and repairs made in accordance with pollution prevention practices?			
	d. ✓ Does the facility keep required records of perc purchases, machine inspections and machine repairs?			
12✓	If emissions of perc are more than 10 tons per year, does the facility have a federal operating permit (Title V)?			

Air Regulations (Chapter 101) – Emission, Maintenance, Start-up, Shutdown

Non Attainment Areas			Early Action Compact Areas		Maintenance Area	Other Areas
Brazoria	Chambers	Collin	Bastrop	Bexar	Victoria	Nueces San Patricio
Dallas	Denton	El Paso	Caldwell	Comal		
Ellis	Ft. Bend	Galveston	Gregg	Guadalupe		
Hardin	Harris	Jefferson	Harrison	Hays		
Johnson	Kaufman	Liberty	Rusk	Smith		
Montgomery	Orange	Parker	Travis	Upshur		
Rockwall	Tarrant	Waller	Williamson	Wilson		

Air Regulations (Chapter 101)		Yes	No	N/A								
13✓	Does the facility track all reportable and non-reportable emission events and report them to TCEQ by March 31 of each year? (101.201)											
14✓	Does the facility track all reportable and non-reportable scheduled maintenance, start-up, and shut-down activities and report them to TCEQ by March 31 of each year? (101.211)											
15✓	Are all records maintained for a minimum of 5 years?											
Dry Cleaner Registration and Fees		Yes	No	N/A								
16✓	Has the facility registered with the TCEQ as required by 30 TAC 337.10?											
17✓	Does the facility submit a new registration annually by August 1 of each year?											
18✓	Does the facility make their registration certificate available for review to persons delivering solvent to their facility, prior to accepting the delivery of solvent or for review by TCEQ staff.?											
19✓	Has the facility verified they are purchasing solvent from a distributor that is currently registered with the TCEQ?											
20✓	Has the facility paid their annual registration fees?											
Waste Regulations (General Requirements)		Yes	No	N/A								
21✓	Has the facility performed a hazardous waste determination on all solid waste streams?											
22✓	Does the facility maintain documentation to support all hazardous waste determinations?											
23✓	Does the facility have records of monthly waste generation to support its claimed generator status? Indicated the generator status claimed.											
	<table border="0"> <tr> <td><u>Generator Status</u></td> <td><u>Accumulation Time/Accumulation Quantity</u></td> </tr> <tr> <td><input type="checkbox"/> Conditionally Exempt Small Quantity Generator (CESQG) up to 220lbs.....</td> <td>No limit/2,200 lbs or less</td> </tr> <tr> <td><input type="checkbox"/> Small Quantity Generator (SQG) 220lbs to 2,200 lbs.....</td> <td>180 days or less¹/13,200 lbs or less</td> </tr> <tr> <td><input type="checkbox"/> Large Quantity Generator (LQG) over 2,200 lbs.....</td> <td>90 days or less/no limit</td> </tr> </table> <p>¹ Can be extended to 270 days if the generator must transport waste 200 miles or more.</p>	<u>Generator Status</u>	<u>Accumulation Time/Accumulation Quantity</u>	<input type="checkbox"/> Conditionally Exempt Small Quantity Generator (CESQG) up to 220lbs.....	No limit/2,200 lbs or less	<input type="checkbox"/> Small Quantity Generator (SQG) 220lbs to 2,200 lbs.....	180 days or less ¹ /13,200 lbs or less	<input type="checkbox"/> Large Quantity Generator (LQG) over 2,200 lbs.....	90 days or less/no limit			
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24✓	Is this facility registered with the TCEQ as a hazardous waste generator? (not required for CESQG) TCEQ Registration No. _____ EPA ID _____											
25✓	Is the facility's Notice of Registration (NOR) up to date, including all waste streams and waste management units? (Not required for CESQG)											
26✓	Has the facility submitted an Annual Waste Summary each year? (Not required for CESQG)											
27✓	Does the facility fulfill all other recordkeeping and reporting requirements for their generator status?											
Waste Regulations (On-Site Accumulations Requirements)		Yes	No	N/A								
28✓	Does the facility comply with appropriate accumulation time requirements?											
29✓	Does the facility comply with appropriate accumulation quantity requirements?											
30	Is hazardous waste accumulated in tanks at the facility?											
31	a. ✓ Has the tank system's integrity been assessed and certified by an independent, qualified, registered professional engineer? (LQG only)											
	b. ✓ Are tanks labeled with the words hazardous waste?											
	c. ✓ Are records kept of daily tank inspections?											
	d. ✓ Do tanks have a secondary containment system designed to contain 100% of the largest tank within its boundaries? (LQG only – 40 CFR 265.193(e))											

	e. ✓ If yes, is the secondary containment either designed or operated to prevent run-on or infiltration of precipitation into the secondary containment system or have sufficient excess capacity to contain run-on or infiltration of precipitation from a 25 year 24 hour rainfall event? (LQG only – 40 CFR 265.193(e))			
32	Is hazardous waste accumulated in container storage areas at the facility?			
33✓	If Yes: Are waste containers labeled, dated, closed, and compatible with their contents? (Compliant for LQG and SQG Only, although CESQG may want to adhere to also)			
34	If the facility is a SQG or LQG:			
	a. ✓ Does the facility conduct weekly container inspections?			
	b. ✓ Does the facility document weekly container inspections?			
	c. ✓ Have employees been trained in the handling of hazardous waste, with regards to their job duties?			
	d. ✓ Has an emergency response coordinator and alternative been designated, available 24 hours a day to responds to on-site spills and accidents?			
	e. ✓ Have emergency number been posted by the telephone at the facility?			
35	Is hazardous waste accumulated in satellite accumulation areas at the facility?			
36	If yes: (required by SQG and LQG)			
	a. ✓ Are waste containers labeled, closed and compatible with their contents?			
	b. ✓ Is the amount of accumulated waste at each satellite accumulation point less than 55 gallons (or 1 quarter of acutely hazardous waste)?			
	c. ✓ Is waste from the satellite area moved to a waste management unit within 3 days once the 55 gallon limit (or 1 quart of acutely hazardous waste) is exceeded?			
	d. ✓ Is the location of the satellite accumulation area documented?			
37✓	Have all on-site and off-site hazardous waste recycling activities been registered with the TCEQ? (entered on NOR or TCEQ 0525, SQG and LQG only)			
38✓	If hazardous waste it treated, stored, or disposed of on-site, has the facility compiled a waste analysis plan (WAP) or obtained a permit for that activity?			
Waste Regulations (Transportation & Disposal Requirements)		Yes	No	N/A
39✓	Does the facility use a TCEQ/EPA registered transporter? (CESQGs may transport their own waste, without a manifest, to an authorized disposal facility)			
40✓	Does the facility use a TCEQ/EPA permitted treatment, storage, disposal (TSD) facility?			
41✓	Does the facility manifest all hazardous and Class I waste that is transported? (SQG, LQG, & CESQGs that generate more than 220lbs of Class I waste. Class I waste sent for recycling does not require a manifest.)			
42✓	Does the facility have copies of manifests (green & white) for the last 3 years? (SQG & LQG only)			
43✓	Does the facility have Land Disposal Restriction (LDR) certification statements per waste stream and disposal facility for the last 3 years? (SQG & LQG only)			
Discharge to Publicly Owned Treatment Works (POTW) (Sanitary Sewer System)		Yes	No	N/A
44	Does the facility discharge process wastewater to the sewer system?			
45	If yes, has the facility obtained permission from the POTW to discharge process wastewater?			
46	a. If the POTW has an approved pretreatment program, does the facility have a permit to discharge process wastewater to the POTW			
	b. Does the facility comply with the requirements of this permit? If this question is not applicable move on to question 55.			
47	If the POTW does not have an approved pretreatment program,			
	a. Is the facility a categorical industrial user subject to the requirements of any category in 40 CFR Parts 405 – 471?			
	b. ✓ If yes, does the facility submit monitoring reports to the TCEQ each June and December?			
	c. ✓ If no, the facility may be required to submit semi-annual monitoring reports to the TCEQ if it is a significant non-categorical industrial user. It is also recommended that the facility contact the city and inform them of the nature of their discharge.			
Discharges to Water in the State		Yes	No	N/A
48	Does the facility discharge wastewater into surface water (via run-off, storm drains, rivers creeks, dry waterways etc)?			
49✓	If yes, does the facility have a Texas Pollutant Discharge Elimination System (TPDES) Permit?			
50	a. ✓ If yes, does the facility meet the daily average flow from each outfall?			
	b. ✓ Does the facility meet the daily maximum flow from each outfall?			
	c. ✓ Does the facility meet the discharge limitation for each constituent?			

	d. ✓ Does the facility conduct monitoring & sampling as required by their discharge permit?			
	e. ✓ Does the facility submit discharge monitoring reports (DMRs) as required by their permit?			
	f. ✓ Does the facility submit non-compliance reports as required by 20 CFR 122.41 & 30 TAC 305.125?			
51	Does the facility dispose of wastewater adjacent to surface water (by irrigation, evaporation pond, subsurface injection, or another approved method)?			
52✓	If yes, does the facility have a Texas Land Application Permit? (Note: if hazardous or Class I industrial waste is being disposed of, then multiple other regulations apply.)			
53✓	Discharges to on-site septic facilities Does the facility avoid discharging any process wastewater to a septic system? (Note: on-site septic systems can only be used for domestic sewage)			
Other Requirements		Yes	No	N/A
54	Does the facility comply with the Texas Department of Health's requirements for Tier II?			
55	Is the facility subject to the Waste Reduction Policy Act (WRPA)?			
56	If yes, a. ✓ Has a Source Reduction Waste Minimization Plan (SR/WM) been developed? (SQGs, LQGs, and TRI reporters submit once every 5 years) b. ✓ Has an Executive Summary of the SR/WM Plan and a Certificate of Completeness and Correctness been submitted? (SQGs, LQGs and TRI reporters only) c. ✓ Has an Annual Progress Report been submitted? (SQGs, LQGs and TRI reporters only)			
57✓	Does the facility have Material Safety Data Sheets (MSDS) or other information for all chemicals used in the past 24 months?			
58	Is there any evidence of spills?			
59✓	If yes, has the facility taken appropriate reporting and abatement actions?			
60✓	Does the facility practice good housekeeping?			

Comments:

This checklist is for guidance purposes only. It is not a substitute for the rules and regulations. The Small Business & Local Government Assistance (SBLGA) Program is an independent section, separate from enforcement of the Texas Commission on Environmental Quality (TCEQ). Contact SBLGA on their toll-free hotline (800) 447-2827 or on the internet at www.sblga.info