

Environmental Auditing

Surviving an Inspection



NEW JERSEY SMALL BUSINESS
ENVIRONMENTAL ASSISTANCE PROGRAM



What is an Environmental Audit?

- Definition
 - An examination of a facility's environmental records and practices while checking for both accuracy and conformance to the organization's environmental policies and regulatory responsibilities.



Auditors Goals

- Auditor should check the following:
 - rules and procedures written down are complied with
 - employees understand their environmental role
 - environmental data measured are within the limits defined internally by the company
 - operations are carried out in accordance with the environmental policy
 - environmental action plans are progressing



Get ready for your Inspection

- Prepare
 - Clean your facility
 - Be knowledgeable about your equipment
 - Be knowledgeable about your environmental obligations
 - Be knowledgeable about who will inspect your facility
 - Inform your staff that inspections are coming
- Conduct a Self-Audit
 - Gather & review your permits and registrations
 - Gather & review your records
 - Make use of available auditing tools: Calendar, Checklist, Self-Audit Guide
 - Interview your staff
 - Evaluate your findings



Know what is Regulated

- Air
 - Permits & MACT Standards
- Waste
 - EPA ID # & RCRA Requirements
- Water
 - Discharges to Waters of the State & to POTWs
- Community Right to Know
 - Annual Survey



Air Requirements

- All dry cleaners must have an Air Permit
 - NJAC 7:27-8.2(c)3
- All Air Permits have a Compliance Plan
 - NJ State requirements for dry cleaning operations
- All PERC dry cleaners have MACT Requirements
 - Federal requirements for dry cleaning operations, including PERC usage limits, control technology requirements, and record keeping requirements.



MACT Requirements

- Equipment Requirements
 - Refrigerated Condenser, Temperature Sensors, (Carbon Absorbers, and PERC Detectors for some facilities)
- Operating Requirements
 - Leak detection, Door Operation, Machine Maintenance, PERC Storage, Draining Filters, and Parts Replacement
- Record Keeping Requirements
 - PERC Purchases, PERC Consumption, Monitoring for Leaks, Condenser Temperature Readings, and Repair Records

JANUARY 2003

CONDENSER TEMP LOG

RUNNING TOTAL

| DATE | TEMP | Is temp less than or equal to 45° F (7.2° C)? |
|------|------|---|
| | | Y N |
| | | Y N |
| | | Y N |
| | | Y N |
| | | Y N |

PERC PURCHASES

| TOTAL FROM LAST MONTH | | |
|--------------------------------------|-----------------|------------------------|
| SUBTRACT PERC PURCHASED JANUARY 2002 | | |
| SUBTOTAL | | |
| PURCHASE DATE | PURCHASE AMOUNT | 12 MONTH RUNNING TOTAL |
| | + | |
| | + | |

REMINDER:

For submitting Right To Know chemical inventory surveys or processing Air Permit Certificate renewals, go to: <http://njdeponline.com/>

Leak inspections and condenser temperature readings must be conducted on recorded a weakly basis.

INSPECTIONS

INSPECTIONS

| INSPECTED | LEAKING? | | | | | DATE PARTS ORDERED | DATE PARTS RECEIVED | DATE REPAIRED |
|--------------------------|----------|---|---|---|---|--------------------|---------------------|---------------|
| | DATE | | | | | | | |
| Hoses | N | Y | N | Y | N | Y | | |
| Door | N | Y | N | Y | N | Y | | |
| Pump | N | Y | N | Y | N | Y | | |
| Button Trap | N | Y | N | Y | N | Y | | |
| Lint Door | N | Y | N | Y | N | Y | | |
| Solvent Tank | N | Y | N | Y | N | Y | | |
| Water Separator | N | Y | N | Y | N | Y | | |
| Muck Cooker | N | Y | N | Y | N | Y | | |
| Still | N | Y | N | Y | N | Y | | |
| Exhaust Damper | N | Y | N | Y | N | Y | | |
| Diverter Valve | N | Y | N | Y | N | Y | | |
| Cartridge Filter | N | Y | N | Y | N | Y | | |
| All Other Filter Gaskets | N | Y | N | Y | N | Y | | |
| Waste Containers | N | Y | N | Y | N | Y | LABELED Y N | DATED Y N |



Waste Requirements

- The requirements for hazardous waste generators are specifically found at N.J.A.C. 7:26G-6 et seq., which references 40 CFR Part 262 of the Federal regulations
- Conditionally Exempt Small Quantity Generators are under 220 lbs of Hazardous Waste per Month
 - Dispose Hazardous Waste appropriately
 - Cannot store more than 2200 lbs on site.
- Small Quantity Generators are above 220 lbs & under 2200 lbs of Hazardous Waste per Month
 - Must have an EPA Id #
 - Must dispose hazardous waste at a regulated facility
 - Must manifest all hazardous waste disposal
 - Must Keep Records for 3 years



Water Requirements

- No discharge to the ground outside, or any water-body.
- No PERC or PERC contaminated water discharge to the sewer.
- Dry cleaning separator water should meet POTW VOC water quality limits prior to discharge.
 - PVSC: No Odor & No Explosion Hazard



CRTK Requirements

- All Dry Cleaners must submit a Community Right to Know Survey
- Deadline March 1st, every year, Submit to:
 - NJDEP
 - Local Fire Department
 - Local Police Department
 - County Lead Agency
 - Local Emergency Planning Committee
 - Keep a copy on site



Auditor Tools

- Dry Cleaning Compliance Calendar
- Dry Cleaning Self-Audit Checklist
- Dry Cleaner Pollution Prevention Checklist
- Hazardous Waste Checklist
- EPA Region 2 Resources



Evaluate findings

- Does the facility meet with the objective of the audit?
 - Compliance with environmental regulations
 - Environmental awareness of employees
 - Conformance to environmental management systems
 - Accuracy of records & data collection systems
 - Effectiveness of pollution controls & prevention
 - Adoption of higher environmental performance standards



Follow-up

- Any corrective action after the audit should be followed up on.
 - Eliminate Illegal Discharges
 - Submit Renewals
 - Obtain or Modify Permits
 - Maintain Equipment
 - Maintain Records
 - Train Employees
 - Contact the NJDEP or EPA Assistance Programs



Audit Benefits

- Helps in the understanding applicable environmental requirements;
- sets environmental goals required for operations;
- an integral part of the environmental management process;
- identifies compliance deficiencies, so they can be corrected; and
- provides P2 opportunities to reduce compliance requirements and increase productivity.

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