

US EPA ARCHIVE DOCUMENT

Quarterly Report – January 2007 - March 2007
STATE INOVATION GRANT PROGRAM (SIG)

**A. PROJECT TITLE: MICHIGAN ENVIRONMENTAL RESULTS PROGRAM (MERP) – DRY
CLEANING SECTOR**

B. APPLICANT INFORMATION:

Lead Agency:

Michigan Department of Environmental Quality (MDEQ)
Environmental Science and Services Division (ESSD)
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Key Contacts in MDEQ - ESSD:

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Geographic Focus:

Michigan - Statewide

C. FUNDING REQUESTED: *Financial information removed by EPA as confidential business information*

D. PROJECT PERIOD: January 2005 through May 2008

I Synopsis of Accomplishments During the Reporting Period

During the 1st Quarter of 2007 (January – March) the MDEQ, continued to make progress on some significant milestones associated with the Environmental Results Program for dry cleaners. A summary of relevant project milestone/tasks considered to be ongoing and completed during this quarter are presented below.

Milestone/Task	Status	Completion Date	Comments
<p>Development of ERP software tool <i>Develop and implement an approach to cost-effectively input and manage the MERP data, including primary and secondary data. Primary data consists of data from inspection reports and facility forms (including self-certification forms). Secondary data sources include lists of facilities from regulatory and private-sector databases.</i></p>	Ongoing	<p><u>Original</u> 10/2006</p> <p><u>Projected</u> 5/2007 8/2007</p>	<p>The majority of time spent on the ERP project for this quarter was associated with this task. Throughout quarter we have been reviewing and commenting on Functional Requirement Specification (FRS) documents and System Design Documents for the two components of the new system (Field Inspection Module and Administrative Module).</p> <p>Several conference calls have occurred to discuss the status of the project and provide further details on any suggestions or comments. It is anticipated that these documents will be finalized early in the next quarter. Once these documents are finalized enfoTech can begin building this system for us to test.</p> <p>Due to delays in review and finalization of the system design documents I have moved the completion date of the software up to August 2007.</p>
<p>Baseline Analysis <i>Analysis of inspection data to establish a baseline for the project's performance measures.</i></p>	Complete	<p><u>Original</u> 6/2006</p> <p><u>Projected</u> 2/2007</p>	<p>Data collected during statewide baseline inspections at 311 facilities from August to December 2006 was compiled into an Excel spread sheet (attached to e-mail). This data was provided to inspectors, management, and EPA for review. EPA will be using the data collected from the baseline inspections in the upcoming ERP results summary report (contact Mike Crow for further details).</p>
<p>Facility Assistance <i>Delivery of compliance/technical assistance to facilities, which is expected to take the form of workbooks, fact sheets, and/or workshops.</i></p>	Ongoing	<p><u>Original</u> 6/2006</p> <p><u>Projected</u> 8/2007</p>	<p>A draft version of the self-audit checklist and self-audit workbook has been developed and is being reviewed by inspectors. The self-audit checklist contains the same or very similar questions as appeared on the checklist used during the baseline inspections to ensure that data will be comparable. Several minor revisions we made based on suggestions received after baseline inspections.</p>

II Narrative Discussion

During the first quarter of 2007 I spent a majority of my time reviewing and providing feed back on the documents that our contractor (enfoTech) will use to develop the new Dry Cleaning system. It is vital that these documents be reviewed thoroughly to ensure that the product that the contactor builds meets all of our specifications. Once the documents are finalized any changes to the system, if deemed significant, could require additional costs. The review of these documents has taken much longer than anticipated due to the fact that we are starting from scratch, trying to develop a new system. Furthermore, we have a lot of ideas for what the system should look like from several different people. I have been trying to sort through these ideas to decide what is possible and what is not. As we go through discussions with the contractor it seems that a lot of the features I envisioned having will not be available, due to system restraints. This has been a problem since we have had to find work-around to some issues that will allow us to have some flexibility within what they can provide. The system also has to be built to collect more than just ERP data, for instance, we are also collecting facility data and licensing information. We have had several discussions with enfoTech on how best to collect self-certification data from sources and input that data into the system within the confines of our budget and system capabilities. We originally felt that a detailed scanning system would be necessary to collect the data, but after doing some research we concluded that a toned down scanning software package is all that is needed at this point. We are currently reviewing the specs from a software scanning company. We will need to use additional grant funds to purchase this software. Due to the amount of time it is taking to review the system documents it is anticipated that completion of the software will not occur until late summer of 2007.

The analysis of the baseline data did not provide any major revelations as to this sectors compliance with air quality requirements. The baseline data identified that a significant number of dry cleaners are not keeping the appropriate records necessary to demonstrate compliance with the NEHSAP. Since our inspectors had not been collecting data on waste and wastewater requirements, the data did point out some compliance issues that we were not aware of. The baseline data showed that 13% of cleaners generated more that 220 lbs of hazardous waste per month, making them small quantity generators. While this is number is higher than what was expected, it is most likely due bad recordkeeping. In reality, many of these sources probably generate less than 220 lbs of hazardous waste per month; however, they lack sufficient records to prove it. We plan to make sure that a detailed explanation of how to calculate monthly waste generation is included in the self-audit workbook. Other data points that stood out are related to wastewater disposal. Our data showed that very few sources had permission or authorization to dispose of their wastewater through the sewer to their wastewater treatment plant. While the MDEQ does not regulate discharges to the sewer system it is important that we inform sources of this requirement. Baseline data also showed that 11 sources were disposing of their wastewater to a septic system. While this number may seem low it was larger than we expected. Previous data showed that only two sources used septic systems. This is a rather big issue that may need to be addressed with our Water Bureau staff, since these facilities may need a permit to discharge their industrial wastewater to a septic system. Further investigation will be necessary. I have attached the Excel Spreadsheet that contains the results from our baseline inspections.

Development of our compliance assistance tools seems to be running smoothly. We have made adjustments to several of the inspection questions based on input gathered from our baseline inspections. I have been working with our inspectors to make the audit as simple and short as possible, which we believe is necessary to ensure that a high number of facilities attempt to complete it.

III Projection of Activities, Accomplishments, and Major expenditures for Next Quarter Report

It is anticipated that by the end of the next quarter we will have finalized our system documents for the dry cleaning database system and enfoTech will begin building the system and provide a test version to us by late June or early July. In addition we plan to finalize the self-audit forms and workbook and develop and outreach strategy.

IV Financial Summary

Financial information removed by EPA as confidential business information.

**DETAILED ITEMIZED BUDGET:
MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
COOPERATIVE AGREEMENT BUDGET DETAIL 01/01/05 - 3/31/07**

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