Florida Department of Environmental Protection

Northwest District Branch Office
3900 Commonwealth Boulevard, MS 55
Tallahassee, Florida 32399-3000

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

March 28, 2012

SENT VIA E-MAIL
bharat@embarqmail.com

Bharat Joshi, Owner
Vogue Cleaners
1839 Thomasville Road
Tallahassee, Florida 32303-5709

Dear Mr. Joshi:

A Department representative inspected your facility to determine compliance with the Air Quality Operating Permit. The program identification number for this facility is **0730074**. Your permit **expires on November 8, 2013**. This letter applies only to activities covered by the Air Resource Management Program.

The Tallahassee Branch Office reported a facility status of **Non Compliance** for the following issue:

> The condenser exhaust cool-down temperature does not appear to comply with 40 CFR Part 63 Subpart M. If applicable, please repair the temperature sensor and/or repair/service the refrigeration condenser unit in order to achieve proper cool-down cycle temperature (45 degrees F. or less). Until repair and/or confirmation of compliance is received, the facility will remain in non compliance status.

The assistance you provided is appreciated. The inspection report is enclosed. If you have any questions, your local contact is Tracy White at (850) 245-2960 or tracy.a.white@dep.state.fl.us .

Sincerely,

Marlane Castellanos

Marlane Castellanos
Branch Manager

MC/tw
Enclosures
cc: Rick Bradburn, Mary Beth Curle, Carol Melton, FDEP, Pensacola

PERCHLOROETHYLENE DRY CLEANERS

COMPLIANCE INSPECTION CHECKLIST

Environmental Compliance

INSPECTION TYPE: ANNUAL (INS1, INS2) ☒ COMPLAINT/DISCOVERY (CI) ☐

RE-INSPECTION (FUI) ☐ ARMS COMPLAINT NO:

AIRS ID#: 0730074 **DATE:** 2/15/2012 **ARRIVE:** _____ **DEPART:** _____

FACILITY NAME: VOGUE CLEANERS

FACILITY LOCATION: 1839 THOMASVILLE RD

TALLAHASSEE 32303-5709

OWNER/AUTHORIZED REPRESENTATIVE: BHARAT JOSHI **PHONE:** (850)222-1322
Email: **Mobile:**
CONTACT NAME: BHARAT JOSHI **PHONE:** (850)222-1322
Email: **Mobile:**
ENTITLEMENT PERIOD: 11/8/2008 (effective date) / 11/8/2013 (end date)

PART I: INSPECTION COMPLIANCE STATUS (check ☑ only one box)

☐ IN COMPLIANCE ☒ MINOR Non-COMPLIANCE ☐ SIGNIFICANT Non-COMPLIANCE

PART II: FACILITY CLASSIFICATION - Rule 62-213.300 FAC
(check ☑ only one box in A)

A. 1. Existing small area source ☐
dry-to-dry only, x < 140 gal/yr
transfer only, x < 200 gal/yr
both types, x < 140 gal/yr
(constructed before 12/9/91)

2. New small area source ☒
dry-to-dry only, x < 140 gal/yr
transfer only, x < 200 gal/yr
both types, x < 140 gal/yr
(constructed on or after 12/9/91)

3. Existing large area source ☐
dry-to-dry only, 140 ≤ x ≤ 2,100 gal/yr
transfer only, 200 ≤ x ≤ 1,800 gal/yr
both types, 140 ≤ x ≤ 1,800 gal/yr
(constructed before 12/9/91)

4. New large area source ☐
dry-to-dry only, 140 ≤ x ≤ 2,100 gal/yr
transfer only, 200 ≤ x ≤ 1,800 gal/yr
both types, 140 ≤ x ≤ 1,800 gal/yr
(constructed on or after 12/9/91)

5. Ineligible for General Permit ☐
d rop store/out of business/petroleum /
facility exceeds above limits

B. The sum of the volume of all perchloroethylene (perc) purchases made in each of the previous 12 months by this dry cleaning facility was 19.3 gallons.

PART III: GENERAL CONTROL REQUIREMENTS – Rule 62-213.300 FAC

(check ☑ only one box for each question)

1. Is all perc, and wastes containing perc, in tightly sealed & impervious containers? ----------	☒ Yes	☐ No	☐ N/A
2. Are all perc. containers leak free ? ----------	☒ Yes	☐ No	☐ N/A
3. Are all machine doors kept closed and secured except during loading/unloading? ----------	☒ Yes	☐ No	
4. Are cartridge filters d rained in their housing or in sealed containers for at least 24 hours prior to disposal? ----------	☐ Yes	☐ No	☒ N/A
5. Has each dry cleaning system installed after December 21, 2005 at an area source, routed the air-PCE gas-vapor stream contained within each dry cleaning machine through a refrigerated condenser and passed the air-PCE gas-vapor stream from inside the dry cleaning machine drum through a non-vented carbon adsorber or equivalent control device immediately before the door of the dry cleaning machine is opened? The carbon adsorber must be desorbed in accordance with manufacturer's instructions. ----------	☒ Yes	☐ No	☐ N/A
6. Is solvent-to-carbon ratios and steam pressure for carbon adsorber beds maintain according to the manufacturer's specifications? ----------	☐ Yes	☐ No	☒ N/A

PART IV: PROCESS VENT CONTROLS – Rule 62-213.300 FAC

(Refer to Part II-A.1.-4. Classification: page 1 of 4, this form)

1. If the f acility classification is an **existing small area source**, no controls are required. **Proceed to Part V.**

2. If the facility classification is a **new small area source**, the machine should be equipped with a refrigerated condenser. **Complete section A. below.**

3. If the fa cility classification is an **existing large area source**, the machine should be equipped with either a refrigerated condenser or a carbon adsorber . **Complete both sections A and B below.** *Carbon adsorber must have been installed prior to September 22, 1993*

4. If the facility classification is a **new large area source**, the machine should be equipped with a refrigerated condenser**. Complete both sections A and B below.**

A. Has the responsible official of all existing large area & new sources:

(check ☑ only one box for each question)

1. Equipped all machines with the appropriate vent controls? ----------	☒ Yes	☐ No	
2. Equipped dry-to-dry machines with a closed-loop vapor venting system? ----------	☒ Yes	☐ No	☐ N/A
3. Equipped the condenser with a diverter valve so airflow will be directed away from the condenser upon opening the door? ----------	☒ Yes	☐ No	☐ N/A
4. Measured and recorded the temperature of the outlet exhaust stream of a refrigerated condenser on a weekly basis? ----------	☒ Yes	☐ No	☐ N/A
5. Repaired or adjusted the equipment within 24 hours if the exhaust temperature of the condenser exceeded 45^{o} F? -- - ----------	☐ Yes	☐ No	☐ N/A
6. Conducted all temperature monitoring after an appropriate cool-down period and after verifying that the coolant had been completely charged? ----------	☐ Yes	☐ No	

PART IV: PROCESS VENT CONTROLS – Rule 62-213.300 FAC (continued)

B. For all existing large or new large area sources:

1. Is the exhaust temperature on the outlet side of the condenser located on dry-to-dry, reclaimer, and dryer machines measured and recorded on a weekly basis? ----------	☐ Yes	☐ No	
2. Is the washer exhaus t temperature at the condenser inlet and outlet measured and recorded weekly? ----------	☐ Yes	☐ No	☐ N/A
a) Is the temperature differential equal to, or greater than 20° F? ----------	☐ Yes	☐ No	☐ N/A
3. Is the perc concentration in the exhaust stream inlet and outlet measured weekly at the end of the final drying cycle while the machine is venting to the adsorber, if machines are equipped exclusively with a carbon adsorber? ----------	☐ Yes	☐ No	☐ N/A
a) Is the perc concentration equal to, or less than 100 ppm? ----------	☐ Yes	☐ No	☐ N/A
4. Is the sampling port on the carbon adsorber exhaust for measuring perc concentrations at least 8 duct diameters downstream of any bend, contraction, or expansion; is at least 2 duct diameters upstream from any bend, contraction, or expansion; and downstream from no other inlet? ----------	☐ Yes	☐ No	☐ N/A
5. Are transfer machines equipped (dryers, reclaimers, and washers) with individual condenser coils? ----------	☐ Yes	☐ No	☐ N/A
6. Is airflow routed to the carbon adsorber (if used) at all times? ----------	☐ Yes	☐ No	☐ N/A

PART V: <u>RECORDKEEPING REQUIREMENTS</u> – Rule 62-213.300(3) FAC

(check ☑ only one box for each question)

1. Are receipts maintained for all perc purchased? ----------	☒ Yes	☐ No	
2. Are rolling monthly total s of yearly perc consumption maintained ? ----------	☒ Yes	☐ No	
3. Are leak detection inspection and repair reports maintained for the following:			
a) Of any leaks repaired w/in 24 hrs? or; ----------	☐ Yes	☐ No	☐ N/A
b) Of any parts ordered to repair leak and leak repaired w/in 2 days and parts installed w/in 5 days of receipt? ----------	☐ Yes	☐ No	☐ N/A
4. Is calibration data maintained for applicable direct reading instruments? ----------	☐ Yes	☐ No	☒ N/A
5. Is exhaust duct monitoring data on perc concentrations maintained? ----------	☐ Yes	☐ No	☒ N/A
6. Is a startup/shutdown/malfunction plan maintained for each machine? ----------	☒ Yes	☐ No	
7. Are deviation reports maintained? ----------	☒ Yes	☐ No	☐ N/A
a) Problem corrected? ----------	☐ Yes	☐ No	☐ N/A
8. Is a compliance plan maintained , if applicable? ----------	☒ Yes	☐ No	☐ N/A

PART VI: LEAK DETECTION AND REPAIRS – Rule 62-213.300 FAC

(check ☑ only one box for each question)

1. What type of leak detection equipment is used to detect leaks?

   ☐ Halogenated hydrocarbon detector ☒ PCE gas analyzer ☐ None used

2. Is the halogenated hydrocarbon detector or PCE gas analyzer operated according to the manufacturer's instructions (*manual was available and RO could demonstrate procedure)* ? ---------- ☒ Yes ☐ No

3. For major sources is the halogenated hydrocarbon detector or PCE gas analyzer operated according to EPA Method 21 ?- ---------- ☐ Yes ☐ No ☒ N/A

4. Is the vapor leak inspection conducted by placing the probe inlet at the surface of each component interface where leakage could occur and moving it slowly along the interface periphery? ---------- ☒ Yes ☐ No

5. Is the PCE gas analyzer a flame ionization detector, photo ionization detector, or infrared analyzer capable of detecting vapor concentrations of PCE of 25 parts per million by volume *(based on documented specifications)* ? ---------- ☒ Yes ☐ No ☐ N/A

6. Is the halogenated hydrocarbon detector capable of detecting vapor concentrations of PCE of 25 parts per million by volume *(based on documented specifications)* and indicating a concentration of 25 parts per million by volume or greater by emitting an audible or visual signal that varies as the concentration changes? ---------- ☐ Yes ☐ No ☒ N/A

7. Are the following dry cleaning system components inspected weekly for perceptible leaks (sight, smell or touch) while the system is in operation (§63.322(k))?

   (Inspection with a halogenated hydrocarbon detector or PCE gas analyzer also fulfills the requirement for inspection of perceptible leaks)

a) Hose connections, fittings, couplings, and valves ----------	☒ Yes	☐ No	☐ N/A	g) Muck cookers --------	☐ Yes	☐ No	☒ N/A
b) Door gaskets and seating ------	☒ Yes	☐ No	☐ N/A	h) Stills ----------	☒ Yes	☐ No	☐ N/A
c) Filter gaskets and seating ------	☒ Yes	☐ No	☐ N/A	i) Exhaust dampers -----	☐ Yes	☐ No	☒ N/A
d) Pumps ----------	☒ Yes	☐ No	☐ N/A	j) Diverter valves ---------	☒ Yes	☐ No	☐ N/A
e) Solvent tanks and containers --	☒ Yes	☐ No	☐ N/A	k) Cartridge filter housings	☒ Yes	☐ No	☐ N/A
f) Water separators ----------	☒ Yes	☐ No	☐ N/A				

8. Are the following dry cleaning system components inspected monthly for vapor leaks using a halogenated hydrocarbon detector or PCE gas analyzer while the system is in operation? *(Any inspection conducted according to this paragraph shall satisfy the requirements to conduct an inspection for perceptible leaks under §63.322(k) or (l))*

a) Hose connections, fittings, couplings, and valves ----------	☒ Yes	☐ No	☐ N/A	g) Muck cookers --------	☐ Yes	☐ No	☒ N/A
b) Door gaskets and seating ------	☒ Yes	☐ No	☐ N/A	h) Stills ----------	☒ Yes	☐ No	☐ N/A
c) Filter gaskets and seating ------	☒ Yes	☐ No	☐ N/A	i) Exhaust dampers -----	☐ Yes	☐ No	☒ N/A
d) Pumps ----------	☒ Yes	☐ No	☐ N/A	j) Diverter valves ---------	☒ Yes	☐ No	☐ N/A
e) Solvent tanks and containers --	☒ Yes	☐ No	☐ N/A	k) Cartridge filter housings	☒ Yes	☐ No	☐ N/A
f) Water separators ----------	☒ Yes	☐ No	☐ N/A				

PART VI: LEAK DETECTION AND REPAIRS – Rule 62-213.300 FAC (continued)

9. What evidence suggests that leak checks are performed as required?

☒ Leak log documentation ☒ RO Assurances ☒ On-site observation ☐ other

Explain other :

Tracy White — Inspector's Name (Please Print)

2/15/2012 — Date of Inspection

Tracy White — Inspector's Signature

Approximate Date of Next Inspection

COMMENTS: I met with Bharat Joshi. Mr. Joshi provided records as requested. Afterwards I observed the drycleaning machine. The machine was in operation. I asked Mr. Joshi to point out the temperature gauge for the evaporator exhaust. I then asked Mr. Joshi if the unit was in cool-down cycle.

He indicated that it was in cool-down. I observed the gauge and noted a reading of 50 degrees Fahrenheit. I informed Mr. Joshi that the required cool-down temperature was 45 degrees or below. I asked him if the machine was near the end of cool-down cycle. He indicated it was, but that there was nothing wrong with the machine. He also indicated that the "…[coolant] pressure was fine."

We observed the operating manual, but we could not locate the appropriate high and low pressure requirements for the machine during cool-down cycle. Mr. Joshi appeared to record temperature measurements in his log sheet.

40 CFR, Part 63 Subpar t M. states the following:

§ 63.323 Test methods and monitoring.
(a) When a refrigerated condenser is used to comply with §63.322(a)(1) or (b)(1):
(1) The owner or operator shall monitor on a weekly basis the parameters in either paragraph (a)(1)(i) or (ii) of this section.
(i) The refrigeration system high pressure and low pressure during the drying phase to determine if they are in the range specified in the manufacturer's operating instructions.
(ii) The temperature of the air-perchloroethylene gas-vapor stream on the outlet side of the refrigerated condenser on a dry-to-dry machine, dryer, or reclaimer with a temperature sensor to determine if it is equal to or less than 7.2°C (45°F) before the end of the cool-down or drying cycle while the gas-vapor stream is flowing through the condenser. The temperature sensor shall be used according to the manufacturer's instructions and shall be designed to measure a temperature of 7.2°C (45°F) to an accuracy of ±1.1°C (±2°F).

The condenser exhaust cool-down temperature does not appear to comply with 40 CFR Part 63 Subpart M. If applicable, please repair the temperature sensor and/or repair/service the refrigeration condenser unit in order to achieve proper cool-down cycle temperature (45 degrees F. or less). Until repair and/or confirmation of compliance is received, the facility will remain in non compliance status.