

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

October 31, 2012

SENT VIA E-MAIL <u>bharat@embarqmail.com</u>

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 status of In Compliance for your facility. Your facility compliance status may be subject to further review by the District Program Office.

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 <u>tracy.a.white@dep.state.fl.us</u>.

Sincerely,

Clifford D. Wilson III, P.E. Northwest District Branch Administrator

CW/tw

Enclosures: Vogue response letter Vogue pressure doc

cc: Rick Bradburn, Mary Beth Curle, Carol Melton (FDEP, Pensacola)

SWOTAL MOTECTION
FLORIDA

PERCHLOROETHYLENE DRY CLEANERS



COMPLIANCE INSPECTION CHECKLIST

INSPECTION TYPE: ANNUAL (INS1, INS2) RE-INSPECTION (FUI)	COMPLAINT/DISCOVERY (CI ARMS COMPLAINT NO:	I)
	ARRIVE: <u>9:30 A.M.</u> D	DEPART: <u>10:00</u>
FACILITY NAME: VOGUE CLEANERSFACILITY LOCATION:1839 THOMASVILLE RI)	
TALLAHASSEE 32303- OWNER/AUTHORIZED REPRESENTATIVE: BHAR Email: CONTACT NAME: BHARAT JOSHI Email: ENTITLEMENT PERIOD: 11/8/2008 / 11/8/2013 (effective date) (end date)		
PART I: INSPECTION COMPLIANCE STATUS (check IN COMPLIANCE MINOR Non-COMPL	· ·	n-COMPLIANCE
PART II: FACILITY CLASSIFICATION (check \square only one box in A) - Rule 62-22 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)	_	91) 2,100 gal/yr ,800 gal/yr 00 gal/yr

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 30 gallons.

PART III: <u>GENERAL CONTROL REQUIREMENTS</u> – Rule 62-213.300 FAC		`	check ☑ x for each c	only one question)
1. Is all perc, and wastes containing perc, in tightly sealed & impervious containers?	\boxtimes	Yes	🗌 No	N/A
2. Are all perc. containers leak free ?	\boxtimes	Yes	🗌 No	N/A
3. Are all machine doors kept closed and secured except during loading/unloading?	\boxtimes	Yes	🗌 No	
 Are cartridge filters d rained in their housing or in sealed containers for at least 24 hours prior to disposal? 	\boxtimes	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	\boxtimes	Yes	L 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:	<u>PROCESS VE</u>	<u>ENT CONTROI</u>	<u>LS</u> – Rule 62-	-213.300 FAC
(Refer to P	art II-A.14. (Classification: 1	page <u>1</u> of <u>4</u> , 1	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 <u>new small area source</u>, 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 <u>new large area source</u>, 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 ☑ x for each c	•
1.	Equipped all machines with the appropriate vent controls?	\boxtimes	Yes	🗌 No	
2.	Equipped dry-to-dry machines with a closed-loop vapor venting system?	\boxtimes	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?	\boxtimes	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° 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?	\boxtimes	Yes	🗌 No	

PA	ART IV: PROCESS VENT CONTROLS – Rule 62-213.300 FAC (continued)			
B. 1.	For all existing large or new large area sources: 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 Yes	D No	⊠ N/A ⊠ 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 ☑ x for each o	only one question)
1. Are receipts maintained for all perc purchased?	\boxtimes	Yes	🗌 No	
2. Are rolling monthly total s of yearly perc consumption maintained ?	\boxtimes	Yes	🗌 No	
3. Are leak detection inspection and repair reports maintained for the following:				
a) Of any leaks repaired w/in 24 hrs? or;	\boxtimes	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?	\boxtimes	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?	\boxtimes	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?	\boxtimes	Yes	🗌 No	N/A

P	ART VI: LEAK DETECTION AND REPAIRS – Rule 62-213.300 FAC	(check 🗹	only one
1.	What type of leak detection equipment is used to detect leaks?	box for each	n question)
	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? \dots	Yes 🗌 No	N/A
7.	Are the following dry cleaning system components inspected weekly for perceptible leaks (sight, sr	mell or touch) wh	ile the
	system is in operation (§63.322(k))?		
	(Inspection with a halogenated hydrocarbon detector or PCE gas analyzer also fulfills the requirement for insp	spection of perception	ble leaks)
	a) Hose connections, fittings, couplings, and valves X Yes No N/A g) Muck cookers	Yes 🗌 No	N/A
		Yes No	\square N/A
	 c) Filter gaskets and seating Xestimate Yes No N/A i) Exhaust dampers All d) Pumps Xestimate Yes No N/A j) Diverter valves Xestimate Yes 	Yes No Yes No	N/A N/A
	e) Solvent tanks and containers \boxtimes Yes \square No \square N/A k) Cartridge filter housings \boxtimes	Yes 🗌 No	N/A
0	f) Water separators Yes No N/A		
0.	Are the following dry cleaning system components inspected <u>monthly</u> for <u>vapor leaks</u> using a halog		
	or PCE gas analyzer while the system is in operation? (Any inspection conducted according to this paragrequirements to conduct an inspection for perceptible leaks under §63.322(k) or (l))	graph shati satisjy i	ne
	a) Hose connections, fittings,		
	couplings, and valves Xes No N/A g) Muck cookers	Yes 🗌 No	N/A
		Yes No Yes No	N/A N/A
	d) Pumps 🛛 Yes 🗌 No 🗌 N/A j) Diverter valves 🖾 Y	Yes 🗌 No	N/A
	 e) Solvent tanks and containers X Yes No N/A k) Cartridge filter housings f) Water separators X Yes No N/A 	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? 						
Tracy White	10/31/2012					
Inspector's Name (Please Print)	Date of Inspection					
I may to the						
Inspector's Signature	Approximate Date of Next Inspection					

COMMENTS:

Mr. Joshi's 4/23/2012 letter, in response to the 2/15/2012 non compliance inspection, indicated that the temperature setting on the machine "should be between 68...and 59 degrees F." However, the indicated and observed cool-down temperatures still did not appear to be in compliance with the rule (45 degrees or less).

On 6/01/2012, I arrived at the facility to perform a follow up inspection. I met with Mr. Joshi. I discussed the rule requirement in regard to cool-down temperature versus monitoring of high and low refrigerent pressures. We appeared to agree that the facility, by rule, could use the alternative method of pressure monitoring. Mr. Joshi indicated he would retrieve the proper, recommended manufacturer's recommendations for pressure (he could not locate or did not have the readings at the site).

On 9/18/2012, I conducted a follow-up inspection visit. Mr. Joshi did not appear to have the pressure information, and he indicated he would retrieve the information and would call back.

I scheduled another follow-up inspection for 9/27/2012. During the inspection, for demonstration purposes, Mr. Joshi voluntarily started the machine in cool-down cycle and I observed approximate readings of 20 bar for high pressure, and 3 to 4 bar for low refrigerant pressure. Since there was some confusion for the gauge scales (pressure units, etc), Mr. Joshi indicated he would again contact the manufacturer. He would then fax the manufacturer's written documention to me the next day.

In a phone conversation on 10/30/2012, I contacted Mr. Joshi in regard to the documentation. Mr. Joshi indicated he had faxed the manufacturer's recommended pressures on 9/27/2012. However, for some unknown reason, I did not receive the fax.

On 10/31/2012, I met with Mr. Joshi in order to retrieve the manufacturer's documentation (follow up inspection) and also to perform a routine inspection. The documentation appeared to match the observations I had made on the 9/27/2012 inspection. The documentation will be attached to this report, along with Mr. Joshi's 4/23/2012 response letter.

Mr. Joshi's leak check and monitoring records were in compliance. He had an onsite leak detector. No odor or leak issues were noted for the machine. The facility appeared to be in compliance.

Rule reference: 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).

DBKJ:Inc. D/B/A Vogue Cleaners 1839 Thomasville Road Tallahassee FL 32303 April 23, 2012

Florida Department Of Environmental Protection N.W. District Branch Office 3900 Commonwealth Boulevard, MS 55 Tallahassee Fl 32399

Dear Ms.Castellanos,

A Department representative came to inspect my facility and we observed the gauge reading of 50 degrees F. According to inspector the reading should read 45 Degrees Fahrenheit. I told the inspector that as it is a new machine may be the specifications are different. He told me they have up to date specifications for all dry cleaning machines. I contacted the Union Dry cleaning Machines manufacturer and they

sent me the Temperature setting for all the machines and my machine is a **800 series** machine and setting should be between 68 degrees F. and 59 degrees F. My machine is set at 50 degrees F which I think is in compliance. Old 700 series machine s the temperature settings is 45 degrees F.

I am enclosing the temperature setting for different models sent by the Union dry cleaning Company. If you have any questions please contact Union Dry cleaning Company at **404-361-7775**.

I hope the above explanation will clear the matter.

Thanks

Since Bharat ეიshi



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 <u>tracy.a.white@dep.state.fl.us</u>.

Sincerely,

Maelane Castellano

Marlane Castellanos Branch Manager

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

PART VI: LEAK DETECTION AND REPAIRS - Rule	e 62-213.300 FAC (continued)
9. What evidence suggests that leak checks are performed a	
Tracy White	2/15/2012
Inspector's Name (Please Print)	Date of Inspection
Inspector's Signature	
	Approximate Date of Next Inspection
COMMENTS: I met with Bharat Joshi. Mr. Joshi provide The machine was in operation. I asked Mr. Joshi to point out Joshi if the unit was in cool-down cycle.	ed records as requested. Afterwards I observed the drycleaning machine. the temperature gauge for the evaporator exhaust. I then asked Mr.
indicated it was, but that there was nothing wrong with the m	and noted a reading of 50 degrees Fahrenheit. I informed Mr. Joshi that y. I asked him if the machine was near the end of cool-down cycle. He lachine. He also indicated that the "[coolant] pressure was fine." the appropriate high and low pressure requirements for the machine erature measurements in his log sheet.
40 CFR, Part 63 Subpar t M. states the following:	0
the manufacturer's operating instructions. (ii) The temperature of the air-perchloroethylene gas-vapor str nachine, dryer, or reclaimer with a temperature sensor to dete cool-down or drying cycle while the gas-vapor stream is flowi	3.322(a)(1) or (b)(1): e parameters in either paragraph (a)(1)(i) or (ii) of this section. using the drying phase to determine if they are in the range specified in ream on the outlet side of the refrigerated condenser on a dry-to-dry ermine if it is equal to or less than $7.2^{\circ}C$ ($45^{\circ}F$) before the end of the ing through the condenser. The temperature sensor shall be used gned to measure a temperature of $7.2^{\circ}C$ ($45^{\circ}F$) to an accuracy of
	ar to comply with 40 CFR Part 63 Subpart M. If applicable, please ration condenser unit in order to achieve proper cool-down cycle nation of compliance is received, the facility will remain in non
	DEBEDW,

5

Thermostat Temperature Settings

1	800 series N					
	Perc: Inlet Air: Recommended setting	176 °F	High point 1	185°F	Low point	104°F
	Outlet Air: Recommended setting	140 °F	High point	158°F	Low point	104°F
	Solvent Temp: Recommended setting	g 68 °F	High point	86°F	Low point	59°F
	Cool Down: Recommended setting	95°F	High point.	1 22° F	Low point	77°F
	Still Bottom: Recommended setting	280°F.	High point	284 °F	Low point	230°F

ATTN:

	t budees			'n			
	<u>Hydro:</u> Inlet Air: Recommended setting	176°F	High point	185°₽	Low point	104°F	
	Outlet Air: Recommended setting	140°F	High point	158°F	Low point	104°F	
•	Solvent Temp: Recommended setting	82°F	High point	t 86°F	Low poin	t 68°F	
	Cool Down: Recommended setting	115°	F High point	122°F	Low poin	it 77°F	
	Still Bottom: Recommended setting	275°I	F High point	284°F	Low point	230°F	
and the second se	<u>GE:</u> inlet Air: Recommended setting	1 <u>86°</u> F	High point	195*F	Low point	104°F	
ł	Outlet Air: Recommended setting	158°F	High point	167°F	Low point	104°F	
	Solvent Temp: Recommended setting	86°F	High point	86°F	Low point	68°F	
	Cool Down: Recommended setting	115°F	High point	122°F	Low point	77°F	
	Still Bottom: Recommended setting	284°F	High point	_ <u>284°F</u>	Low point	230°F	
	700 series (older) perc: Cold Air:Recommended setting	ろし 45°F	High point	ኝ	Low point	34 40°F	

Dry:Recommended setting 140°F High point 158°F Low (700 series the drying control themperature was just in the drum outlet) Low point 104°F

68°F

Solvent temp:Recommended setting

High point

86°F Low point

700 series (older) hydro: same as 800 series????

Date: 5-15-2003

How the Refrigeration Unit should operate on the U2000 models.

During Dry:

1, 5, 6, 7, 8

When the Dry Temp reaches 140 F then the Cold Air Temp Gauge should be around

The Refrigeration Gauges should read: HIGH28 Bar, LOW 5 Bar (Jo Bar)

NO BUBBLES IN THE SIGHT GLASS.

If there are bubbles in the sight glass this could indicate the following:

Low Freon in the machine

If the Low Side gauge is low between 2-3.5 then the filters could be very dirty, coils dirty, fan not working, damper not opening fuliy.

A good sign of the unit working properly is a cool (not cold) suction line to the compressor and a HOT discharge on the bottom of the compressor. Also the water Freon receiver will be warm/hot from the top to the bottom,

During Cooldown:

1, 5, 6, 7

Last 210 Seconds

At the end the cooldown the gauges should read approximately: Drying = 113 F COLD AIR TEMP = 59 F

The Ref gauges should be at 20 bar and approx 3.5 bar. No bubbles in the sight glass

The compressor lines should be the same as drying.

During the Recuper Step.

1, 7, 10 for 5 minutes

The Ref Gauges should be at 20 bar and 3.5 bar. The low side will slowly drop to around 1 bar by the end.

The Drying Gauge should be approx 100 F and the COLD AIR TEMP should be at 45F or below.

The Compressor should feel the same as drying and cooldown. But some bubbles in the sight glass is normal.

If the top of the compressor is freezing them the filters could be dirty, coil dirty, Recuper fan not running, etc...

If the temperature does not drop on the COLD AIR TEMPERATURE gauge then check the following:

Make sure the pipe leaving the Drying chamber going to the Recuper(it is 1.5" and is in the front of the machine behind the electrical panel). Make sure this pipe is COLD. If so then maybe the probe is not in the best position for the airflow.

If the compressor is freezing then try to close the expansion valve a few turns counterclockwise to decrease the amount of Freon going to the coil.

If the expansion value has been replaced then it might need readjusting the capillary bulb should be in the 11 o'clock or 1 o'clock position. Not the 12 o'clock position.

MUNDIAL

Refrigeration Sequence

UNON MACHINE

Refrigeration Sequence of Operation:

Depending on the model of the machine there can be a maximum of 5 solenoid valves.

PERC MACHINES

Most Perc machines with water cooled refrigeration have a total of three. Two of these are directly beside the compressor. EF 34 (on the left) controls the heat pump circuit. (Buttons 1, 5, 6, 7, 8). EF 35 is on the right and it controls the cool-down cycle (Buttons 1, 5, 6, 7). But both solenoids will open for 15 seconds to equalize the pressure on the startup of drying (heat pump) and cool-down. If a sudden increase (over 24 bar) in pressure along with a A4 alarm is noted after 15 seconds them most of the time the diaphragm could be defective in the corresponding solenoid valve. It is recommended to first check that voltage is being sent to both red wires 34 and 35 and then depending on the cycle one of these will lose power therefore closing the solenoid. If the voltage is checked and is normal (24 volts AC) then the diaphragm is probably bad and needs replacing. It is recommended to replace both diaphragms and the filter dryer if the unit is evacuated.

The other solenoid value is for the liquid line. It is opened anytime button 7 is pressed. If a problem is in this coil or diaphragm the unit will pump down the Freon into the receiver tank and the compressor will cut off on low pressure. This can be noted by the low pressure gauge showing 0.

On machines with refrigeration cooled solvent cooling then the other solenoid will function when the pump circuit is on and the thermostat calls for cooling of the solvent. If this solenoid does not open then you will see the compressor pump down the Freen into the receiver tank and the compressor cut off on low pressure. This can be noted by the low pressure gauge showing 0.

If a gradual increase in pressure is noted up to the cutoff of 348 psi (24 bar) A4 alarm. Then the machine could have a water restriction problem (blocked strainer, chiller pressure problem), water temperature problem (water is too hot coming into the machine), overcharged condition (noted by a cool to the touch receiver tank at the bottom), or a scaled receiver tank condition that would require an acid wash to remove the scale. This is noted mainly on machines utilizing a water tower system for cooling.