

PERCHLOROETHYLENE DRY CLEANERS



 $\boxtimes$ 

#### **COMPLIANCE INSPECTION CHECKLIST**

 $\boxtimes$ COMPLAINT/DISCOVERY (CI) **INSPECTION TYPE:** ANNUAL (INS1, INS2) RE-INSPECTION (FUI)

ARMS COMPLAINT NO:

<b>AIRS ID#:</b> 103 0296	Date: 10/20/2010	Time In: 11:45AM	Time Out: 12:30 PM			
Facility Name:	Spartan Enterprises, In	с.				
Facility Location:	32646 U.S. Highway 1					
	Palm Harbor, FL, 346					
<b>Responsible Official:</b>	Keith McNamara	Phone N	No: 727-784-4050			
L	New, Large Perchloroe	thylene Dry Cleaner. O	ne Dry-to-dry machine, pur	chased		
Emis. Unit Description:	-		ser. 25 HP, natural gas fired			
-	is on-site slj	č				
Permit Number:	1030296-003-AG	Exp. Da	ate: 7/26/2011			
Facility Contact:	Keith McNamara	Phone:	727-784-4050			
<b>Compliance Status:</b>		C SNC				
PART I: NOTIFICATIO	N (Check appropriate box)					
1. Existing facility notified	d DARM by 9/1/96					
2. New facility notified DA	ARM 30 days prior to st	artup		$\boxtimes$		
3. Facility <b>failed to notify</b>	DARM to use general p	permit				
PART II: CLASSIFICAT	PART II: CLASSIFICATION					
Facility indicated on noti	fication form that it is:					
No Notification Form	Drop-Off Store	e Out of business	Petroleum Solvent	t Only		
А.						
1. Existing small area	source	2. New small	area source			
Dry-to-dry only, $x < 14$	) gal/yr	Dry-to-dry on	ly, <b>x &lt;140</b> gal/yr			

(Constructed before 12/9/91)	(Constructed on or after 12/9/91)
This is a correct facility classification	🛛 Y 🔲 N 🔲 Can not determine
If no, please check the appropria	ate classification:
☐ Facility qualified for a general	l permit as number <u>4</u> above.
☐ Facility exceeds above limits a	and is not eligible for a general permit

 $\square$ 

Transfer only, x < 200 gal/yr

(Constructed on or after 12/9/91)

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

Both types, x < 140 gal/yr

4. New large area source

Transfer only, x < 200 gal/yr

(Constructed **before 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

Both types, x < 140 gal/yr

B. Highest 12-month consecutive total of perchloroethylene purchased in the preceding 12-month period: <u>120</u> Gallons. Month with highest use was <u>September 2010</u>. Did facility exceed limits  $\Box Y \boxtimes N$ 

#### PART III: GENERAL CONTROL REQUIREMENTS

Is the responsible official of the dry cleaning facility: (Check appropriate boxes)			
1. Storing perchloroethylene in tightly sealed and impervious containers?	⊠ Y	$\Box$ N	□ NA
2. Examining the containers for leakage?	$\boxtimes Y$	$\Box$ N	□ NA
<ul><li>3. Closing and securing machine doors except during loading/unloading?</li><li>4. Draining cartridge filters in their housing or in sealed containers for at</li></ul>	⊠ Y	$\Box$ N	
least 24 hours prior to disposal?	$\boxtimes \mathbf{Y}$	$\Box$ N	$\Box$ NA
5. Maintaining solvent-to-carbon ratios and steam pressure for carbon adsorber beds according to the manufacturer's specifications?	⊠ Y	□N	□ NA

#### PART IV: PROCESS VENT CONTROLS

#### In Part II-A:

If classification (1) has been checked, no controls are required. Proceed to Part V.

If classification (2) has been checked, the machine should be equipped with a refrigerated condenser (complete A below) If classification (3) has been checked, the machine should be equipped with either a refrigerated condenser or a carbon adsorber (complete A and B below). A Carbon adsorber must have been installed prior to September 22, 1993. If classification (4) has been checked, machine should be equipped with a refrigerated condenser (complete A and B below.)

#### A. Has the responsible official of all new sources and existing large area sources: (check appropriate boxes)

1. Equipped all machines with the appropriate vent controls?	$\boxtimes Y$	$\Box$ N	$\Box$ NA
2. Equipped dry-to-dry machines with a closed-loop vapor venting system?	$\boxtimes \mathbf{Y}$	$\Box$ N	□ NA
3. Equipped the condenser with a diverter valve so airflow will be directed away from the condenser upon opening the door?	⊠ Y	□N	□ NA
4. Measured and recorded the temperature of the outlet exhaust stream of a refrigerated condenser on a weekly basis?	⊠ Y	□N	□ NA
5. Repaired or adjusted the equipment within 24 hours if the exhaust temperature of the condenser exceeded $45^{\circ}$ F?	⊠ Y	□N	□NA
6. Conducted all temperature monitoring after an appropriate cool down period and after verifying the coolant had been completely charged?	⊠ Y	□N	□ NA

#### B. Has the responsible official of an existing large or new large area source also:

1.	Measured and recorded the exhaust temperature on the outlet side of the condenser located on dry-to-dry, reclaimer, and dryer machines on a weekly basis?	⊠Y	□N
2.	Measured and recorded the washer exhaust tem- weekly?	ΠY	DN DNA
	Is the temperature differential equal to on F?	ΠY	□N □NA
3.	Measured and recorded the concentration veekly at the end of the		
	final drying cycle while the e is venting other, machines are equipped		
	with a carbon and i or?	$\Box Y$	□N □NA
	Is the performed or less the ppm?	$\Box Y$	□N □NA

4.	Assured that the sampling port on the carbon adsorber exhaust for measuring perc. concentrations is at least 8 duct diameters downstream of any bend, contraction, or expansion; is at least 2 dust diameters upstream from any bend contraction, or expansion; and downstream from no other inlet?	□y □n □na
5.	Equipped transfer machines (dryers, reclaimers, and washers) with individual condenser coils?	□y □n □na
6.	Routed airflow to the carbon adsorber (if used) at all times?	□Y □N □NA

PART V:	<b>RECORDKEEPING REQUIREMENTS</b>	

#### Has the responsible official:

(Check appropriate boxes)

1.	Maintained receipts for perc purchased?	⊠Y	□N
2.	Maintained rolling monthly averages of perc consumption?	⊠Y	□N
3.	<ul> <li>Maintained leak detection inspection and repair reports for the following:</li> <li>a. Documentation of leaks repaired w/in 24 hrs? or;</li> <li>b. Documentation of parts ordered to repair leak and leak repaired w/in 2 days and parts installed w/in 5 days of receipt?</li> </ul>	□Y □Y	$ \squareN \boxtimes NA \\ \squareN \boxtimes NA $
4.	Maintained calibration data? (direct reading instruments only)	ΠY	□N ⊠NA
5.	Maintained exhaust duct monitoring data on perc concentrations?	ΠY	□N ⊠NA
6.	Maintained startup/shutdown/malfunction plan?	⊠Y	□N
7.	Maintained deviation reports? Problem corrected?	□Y □Y	$ \square N \boxtimes NA \\ \square N \boxtimes NA $
8.	Maintained compliance plan, if applicable?	ΠY	□N ⊠NA

### PART VI: LEAK DETECTION AND REPAIRS

1.	Does the responsible official conduct weekly le	ak det	ection a	nd repair inspection?	$\boxtimes \mathbf{Y}$	□N
2.	Which method of detection does the responsible official use?					□N
	Visual examination (condensed solvent of exterior surfaces)					□N
	Physical detection (airflow felt through gaskets)					
	Odor (noticeable perc odor)				$\boxtimes \mathbf{Y}$	□N
	Use of direct-reading instrumentation (FII	D/PID/	calorime	tric tubes)	$\Box Y$	$\boxtimes N$
	If using direct-reading instrumentation, is the	equip	ment:		ΩY	ΠN
	a. Capable of detecting perc vapor concen	tration	s in a rar	nge of 0-500 ppm	ΠY	ΠN
	b. Calibrated against a standard gas prior t	o and	after eac	h use (PID/FID only).	ΩY	ΠN
	c. Inspected for leaks and obvious signs of wear on a weekly basis?					
	d. Kept in a clean and secure area when not in use.					
	e. Verified for accuracy by use of duplicat	e samp	ples (calc	primetric only)?	ΩY	ΠN
3.	Has the facility maintained a leak log?				$\boxtimes \mathbf{Y}$	$\Box N$
4.	The following area should be checked for leaks	s by th	e operat	tor:	$\boxtimes \mathbf{Y}$	$\Box N$
	Hose connections, fitting couplings, and valves	$\boxtimes \mathbf{Y}$	□N	Muck cookers	$\Box Y$	$\boxtimes N$
	Door gaskets and seating	$\boxtimes \mathbf{Y}$	□N	Stills	$\boxtimes \mathbf{Y}$	□N
	Filter gaskets and seating	$\boxtimes \mathbf{Y}$	□N	Exhaust dampers	$\boxtimes \mathbf{Y}$	□N
	Pumps	$\boxtimes \mathbf{Y}$	□N	Diverter valves	ΠY	$\boxtimes N$
	Solvent tanks and containers	$\boxtimes \mathbf{Y}$	□N	Cartridge Filter housing	$\boxtimes \mathbf{Y}$	□N
	Water separators	$\boxtimes \mathbf{Y}$	□N			

Shea Jackson	October 20, 2010
Inspector's Name (Please Print)	Date of Inspection
	Within one year of this inspection
Inspector's Signature	Date of Next Inspection

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### System Inspection and Leak Detection

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.)  $\boxtimes Y \quad \Box N \quad \Box NA$ 

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).  $\boxtimes$ Y  $\square$ N  $\square$ NA

- (1) Hose and pipe connections, fittings, couplings, and valves;
- (2) Door gaskets and seatings;
- (3) Filter gaskets and seatings;
- (4) Pumps;
- (5) Solvent tanks and containers;
- (6) Water separators;
- (7) Muck cookers;
- (8) Stills;
- (9) Exhaust dampers;
- (10) Diverter valves; and
- (11) All Filter housings

Is the halogenated hydrocarbon detector or PCE gas analyzer operated according to the manufacturer's instructions?  $\boxtimes Y \quad \Box N \quad \Box NA$ 

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?  $\square Y \square N \square NA$ 

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?  $\Box Y \quad \Box N \quad \boxtimes NA$ 

Is the halogenated hydrocarbon detector capable of detecting vapor concentrations of PCE of 25 parts per million by volume 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?  $\boxtimes Y \quad \Box N \quad \Box NA$ 

#### **ADDITIONAL SITE INFORMATION**

Facility Name:	Spartan Enterprises, Inc.
ARMS #:	103 0296

#### **Inspection Comments:**

- Inspection of the facility, I met with Mr. Keith McNamara, the responsible official and Mr. Terry Kincaide, the facility maintenance technician. Mr. Kincaide performs maintenance and leak check observations of the dry to dry and maintains the calendar records
- I reviewed the records. The Perc totals and leak check observations were up to date 10/18/2010. Mr. Kincaide, stated they had obtained the Perc from their other plant, in 2009. The Perc usage totals were reviewed from January 2009 through September 2010. The Perc purchase invoices were in binder. I observed 4 purchase orders from 2010, each for 30 gallons. The highest 12 month total was for September 2010 was for 120 gallons
- The Hazardous waste manifest is also maintained in a binder. The most recent amounts dispose of was 2 drums on 9/1/2010.
- The temperature indicated on the record was 7 <sup>o</sup>C. This is acceptable temperatures below 7.5 <sup>o</sup>C.
- Mr. Kincaide demonstrated the use of the Halogen detector. He turned on, and detector emits a low beeping, he went around the door, button traps, piping, and area previous leaks had been found. The halogen detector did not alarm. (see photos) Mr. Kincaide indicated the filter cartridges had been drained for a day, and replaced on 10/19/2010.
- There were no perc odors detected during observations of the dry to dry operation.
- The Hazardous waste containers were in secondary containment. (see Photos)
- The facility collects the separator water and puts into the Galaxy mister evaporator.
- I gave Mr. Kinkaide the two P2 information brochures for Dry Cleaning industry.
- The facility was in compliance at the time of this inspection.

#### ADDITIONAL SITE INFORMATION

Facility Name	: Spartan Ent	erprises, Inc.	
ARMS #:	103 0296		
Machine #1:			
Manufacturer	Union	Capacity lbs	
Model#		Serial# Mfg y	r
Machine #2:			
Manufacturer		Capacity lbs	
Model#		Serial# Mfg y	r
	npermitted sour	•	
		ing out the notification by the inspector? $\Box Y$	$\boxtimes N$
	-	g out its own notification, and will send it to FDEP? $\Box Y$	$\boxtimes N$
Record keepin	0		
		pees as to the design accuracy of the temperature sensor? $\square Y$	$\Box$ N
· -		accuracy $\pm -2^{0}$ F, or 7.2EC w/accuracy of $\pm -1.1^{0}$ C)	
Hazardous Wa	aste:		
1. Is all perc. co	ontaminated waste	ewater either treated or disposed of properly? $\square Y$	$\Box$ N
2. If wastewate	r is evaporated, is	it an approved system, and using carbon filtration? $\square Y$	$\Box$ N
	•	ry containment for the dry-dry machine? $\square Y$	$\Box$ N
4. Does the fact	lity have seconda	ry containment for any perc. waste containers? $\square Y$	$\Box$ N
Boiler:			
Manufacturer	Hurst	Нр	25
Model #	4VTD25\50	Serial # VGI-150-1233 Mfg y	r 2002
Fuel Type:	Natural gas?	$\square \qquad Propane?  \Box \qquad Fuel oil?  \Box$	
Comments:	Boiler is exempt	from permitting	

32646 U.S. Highway 19 North, Palm Harbor



 Project Id:
 75684
 Permit No: 1030296-003-AG
 Arms Number: 0296

 Inspector:
 Shea Jackson
 Inspection Date / Time: 10/20/2010

 Source (EU):
 New, Large Perchloroethylene Dry Cleaner. One Dry-to-dry machine, purchased in December 1994, with a refrigerated condenser. 25 HP, natural gas fired boiler is on-site slj

**Description:** [Mr. Kincaide demonstrating the use of the Halogen detector for leak checks for Perc around the door ]

32646 U.S. Highway 19 North, Palm Harbor



 Project Id:
 75684
 Permit No: 1030296-003-AG
 Arms Number: 0296

 Inspector:
 Shea Jackson
 Inspection Date : 10/20/2010

 Source (EU):
 New, Large Perchloroethylene Dry Cleaner. One Dry-to-dry machine, purchased

 in December 1994, with a refrigerated condenser. 25 HP, natural gas fired

 boiler is on-site

**Description:** [Mr. Kincaide demonstrating the use of the Halogen detector for leak checks for Perc in the rear of the dry to dry machine ]

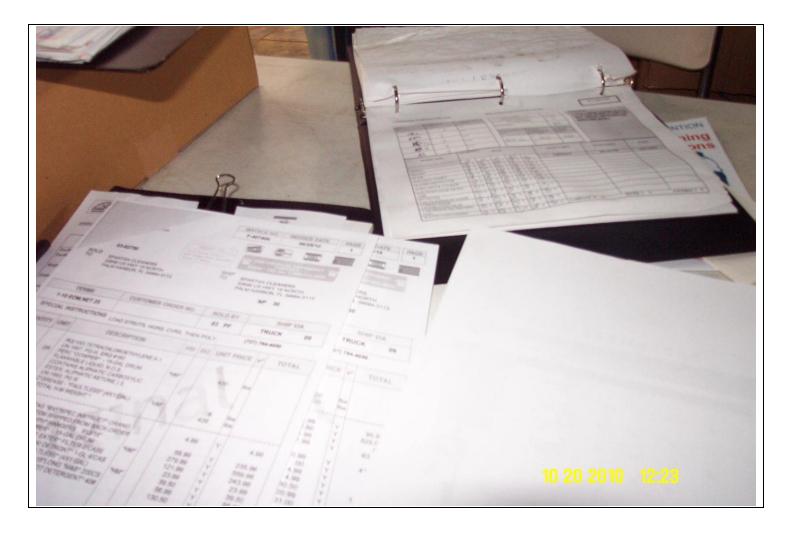
32646 U.S. Highway 19 North, Palm Harbor



Project Id:75684Permit No: 1030296-003-AGArms Number: 0296Inspector:Shea JacksonInspection Date: 10/20/2010Source (EU):New, Large Perchloroethylene Dry Cleaner. One Dry-to-dry machine, purchased<br/>in December 1994, with a refrigerated condenser. 25 HP, natural gas fired<br/>boiler is on-site slj

**Description:** [The hazardous waste containers in the secondary containment are stored at the rear of the machine.]

32646 U.S. Highway 19 North, Palm Harbor



 Project Id:
 75684
 Permit No: 1030296-003-AG
 Arms Number: 0296

Inspector: Shea Jackson Inspection Date / Time: <u>10/20/2010</u> / \_\_\_\_\_

Source (EU): New, Large Perchloroethylene Dry Cleaner. One Dry-to-dry machine, purchased

in December 1994, with a refrigerated condenser. 25 HP, natural gas fired boiler is on-site slj

**Description:** [Review of the records, perc purchase orders ]

32646 U.S. Highway 19 North, Palm Harbor



 Project Id:
 <u>75684</u>
 Permit No: 1030296-003-AG
 Arms Number: 0296

 Inspector:
 <u>Shea Jackson</u>
 Inspection Date / Time: <u>10/20/2010</u> / \_\_\_\_\_

 Source (EU):
 New, Large Perchloroethylene Dry Cleaner. One Dry-to-dry machine, purchased in December 1994, with a refrigerated condenser. <u>25 HP</u>, natural gas fired boiler is on-site slj

 Description:
 [This is the facilities boiler which is located in an outside room connected to the

**Description:** [This is the facilities boiler which is located in an outside room connected to the building]