PERCHLOROETHYLENE DRY CLEANERS

COMPLIANCE INSPECTION CHECKLIST

Environmental Compliance

INSPECTION TYPE: ANNUAL (INS1, INS2) ☒ COMPLAINT/DISCOVERY (CI) ☐
RE-INSPECTION (FUI) ☐ ARMS COMPLAINT NO: ☐

AIRS ID#: 103 0296	**Date: 12/3/12** **Time In: 3:00PM** **Time Out: 3:40PM**		
Facility Name:	Spartan Enterprises, Inc.		
Facility Location:	32646 U.S. Highway 19 North		
	Palm Harbor, FL, 34684		
Responsible Official:	Keith McNamara	**Phone No:**	727-784-4050
Emis. Unit Description:	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		
Permit Number:	1030296-004-AG	**Exp. Date:**	6/13/16
Facility Contact:	Keith McNamara	**Phone:**	727-784-4050
Compliance Status:	☒ **IN** ☐ **MNC** ☐ **SNC**		

PART I: NOTIFICATION (Check appropriate box)

1. **Existing** facility notified DARM by 9/1/96 ☐
2. **New** facility notified DARM 30 days prior to startup ☒
3. Facility **failed to notify** DARM to use general permit ☐

PART II: CLASSIFICATION

Facility indicated on notification form that it is:
☐ No Notification Form ☐ Drop-Off Store ☐ Out of business ☐ Petroleum Solvent Only

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**)

This is a correct facility classification ☒ Y ☐ N ☐ Can not determine

If no, please check the appropriate classification:
☒ Facility qualified for a general permit as number **4** above.
☐ Facility exceeds above limits and is not eligible for a general permit

B. Highest 12-month consecutive total of perchloroethylene purchased in the preceding 12-month period: 180 Gallons. Month with highest use was Octoer 2012. Did facility exceed limits ☐Y ☒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	☐ N	☐ NA
2. Examining the containers for leakage?	☒ Y	☐ N	☐ NA
3. Closing and securing machine doors except during loading/unloading?	☒ Y	☐ N	
4. Draining cartridge filters in their housing or in sealed containers for at least 24 hours prior to disposal?	☒ Y	☐ N	☐ 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?	☒ Y	☐ N	☐ NA
2. Equipped dry-to-dry machines with a closed-loop vapor venting system?	☒ Y	☐ 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 45^0 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 temp[illegible]re at the condenser inlet and outlet weekly?	☐Y	☐N	☐NA
Is the temperature differential equal to o[illegible] ^{0} F?	☐Y	☐N	☐NA
3. Measured and recorded th[illegible] concentration [illegible] weekly at the end of the final drying cycle while the [illegible]e is venting [illegible]rber, machines are equipped with a carbon ad[illegible]or?	☐Y	☐N	☐NA
Is the pe[illegible]n e[illegible]or less tha[illegible] ppm?	☐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: RECORDKEEPING REQUIREMENTS

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.	Maintained leak detection inspection and repair reports for the following:			
	a. Documentation of leaks repaired w/in 24 hrs? or;	☐Y	☐N	☒NA
	b. Documentation of parts ordered to repair leak and leak repaired w/in 2 days and parts installed w/in 5 days of receipt?	☐Y	☐N	☒NA
4.	Maintained calibration data? *(direct reading instruments only*)	☐Y	☐N	☒NA
5.	Maintained exhaust duct monitoring data on perc concentrations?	☐Y	☐N	☒NA
6.	Maintained startup/shutdown/malfunction plan?	☒Y	☐N	
7.	Maintained deviation reports?	☐Y	☐N	☒NA
	Problem corrected?	☐Y	☐N	☒NA
8.	Maintained compliance plan, if applicable?	☐Y	☐N	☒NA

PART VI: LEAK DETECTION AND REPAIRS

1.	**Does the responsible official conduct weekly leak detection and repair inspection?**	☒Y	☐N
2.	**Which method of detection does the responsible official use?**	☒Y	☐N
	Visual examination (condensed solvent of exterior surfaces)	☒Y	☐N
	Physical detection (airflow felt through gaskets)	☒Y	☐N
	Odor (noticeable perc odor)	☒Y	☐N
	Use of direct-reading instrumentation (FID/PID/calorimetric tubes)	☐Y	☒N
	If using direct-reading instrumentation, is the equipment:	☐Y	☐N
	a. Capable of detecting perc vapor concentrations in a range of 0-500 ppm	☐Y	☐N
	b. Calibrated against a standard gas prior to and after each use (PID/FID only).	☐Y	☐N
	c. Inspected for leaks and obvious signs of wear on a weekly basis?	☐Y	☐N
	d. Kept in a clean and secure area when not in use.	☐Y	☐N
	e. Verified for accuracy by use of duplicate samples (calorimetric only)?	☐Y	☐N
3.	**Has the facility maintained a leak log?**	☒Y	☐N
4.	**The following area should be checked for leaks by the operator:**	☒Y	☐N

Hose connections, fitting couplings, and valves	☐Y	☒N	Muck cookers	☐Y ☒N
Door gaskets and seating	☒Y	☐N	Stills	☒Y ☐N
Filter gaskets and seating	☒Y	☐N	Exhaust dampers	☒Y ☐N
Pumps	☐Y	☒N	Diverter valves	☐Y ☒N
Solvent tanks and containers	☒Y	☐N	Cartridge Filter housing	☒Y ☐N
Water separators	☒Y	☐N		

Shea Jackson	12/3/12
Inspector's Name (Please Print)	Date of Inspection
	Within one year of this inspection
Inspector's Signature	Date of Next Inspection

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.) ☒Y ☐N ☐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). ☒Y ☐N ☐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? ☒Y ☐N ☐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? ☒Y ☐N ☐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? ☐Y ☐N ☒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? ☒Y ☐N ☐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. I reviewed records and he showed machine as in operation during dry cycle. Mr. Kincaide performs maintenance and leak check observations of the dry to dry machine, and also maintains the calendar leak, temperature and Perc total records.*
- *I reviewed the calendar records. The Perc usage totals were reviewed from December 2011 through December 2012. I observed the purchase orders from 2011- 2012.*
- *The Perc purchase invoices are maintained in a separate binder with Mr. McNamara. The Perc totals and leak check observations were up to date current total was 150 gallons. I noted Mr. Kincaide had to correct his calculations for monthly totals. He stated he has trouble sometimes keeping the Purchase of Perc up to date in records. I asked Mr. McNamara to furnish him a P.O. copy to maintain with the calendar so Mr. Kincaide does get behind on adding Perc purchases into monthly records, and to help check his calculations.*
- *The purchases are typically 2- 15 gallons for 30 gallons. The most recent was 11/26/12. The facility purchases Perc bi monthly*
- *The highest 12 month total was for October 2012 for 180 gallons. Mr. McNamara stated the business had been steady for this year.*
- *The Hazardous waste manifests are also kept in a binder by Mr. McNamara. The most recent amounts dispose of was 2 drums on 10/30/2012.*
- *The temperature indicated on the records is typically 7 ^{O}C. This is acceptable temperatures below 7.2 ^{O}C. Mr. Kincaide stated the temperature is steady, but I record he had noted there was a Freon leak repair done October 2012 and November 2012 a comment re chiller was repaired.*
- *I asked Mr. Kincaide to use the Halogen detector to check for leaks. The detector emits a low beeping, as he went around the door, button traps, piping, and rear area of the dry to dry machine, there were no leaks found. The halogen detector did not alarm. (see photos)*
- *There were no perc odors detected during observations of the dry to dry machine in operation.*
- *The Hazardous waste containers were in secondary containment. (see Photos)*
- *The facility collects the separator water and puts into the Galaxy mister evaporator, which was covered and in secondary containment.*
- *I gave Mr. McNamara the inspection summary, I asked him to check Mr. Kincaide's Perc totals as he sometimes makes errors.*
- *The facility was in compliance at the time of this inspection.*

ADDITIONAL SITE INFORMATION

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

Machine #1:				
Manufacturer	Union	Capacity	lbs	
Model#		Serial#	Mfg yr	1994
Machine #2:				
Manufacturer		Capacity	lbs	
Model#		Serial#	Mfg yr	

Notification (unpermitted sources only):

1. Was the facility assisted in filling out the notification by the inspector?	☐Y	☒N
2. Did the facility insist on filling out its own notification, and will send it to FDEP?	☐Y	☒N

Record keeping :

1. Does facility have statement/specs as to the design accuracy of the temperature sensor? (Temperature of 45^0F w/accuracy +/– 2^0F, or 7.2EC w/accuracy of +/– 1.1^0C)	☒Y	☐N

Hazardous Waste:

1. Is all perc. contaminated wastewater either treated or disposed of properly?	☒Y	☐N
2. If wastewater is evaporated, is it an approved system, and using carbon filtration?	☒Y	☐N
3. Does the facility have secondary containment for the dry-dry machine?	☒Y	☐N
4. Does the facility have secondary containment for any perc. waste containers?	☒Y	☐N

Boiler:

Manufacturer	Hurst			Hp	25
Model #	4VTD25\50	Serial #	VGI-150-1233	Mfg yr	2002

Fuel Type: Natural gas? ☒ Propane? ☐ Fuel oil? ☐

Comments: Boiler is exempt from permitting

Spartan Enterprises, Inc. Spartan Cleaners - Plant #1

32646 U.S. Highway 19 North, Palm Harbor

Project Id: 84685 **Permit No:** 1030296-003-AG **Arms Number:** 0296

Inspector: Shea Jackson **Inspection Date / Time:** 12/3/2012 / _____

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: [This is the Union dry to dry machine]

Spartan Enterprises, Inc. Spartan Cleaners - Plant #1

32646 U.S. Highway 19 North, Palm Harbor

Project Id: 84685 **Permit No:** 1030296-003-AG **Arms Number:** 0296

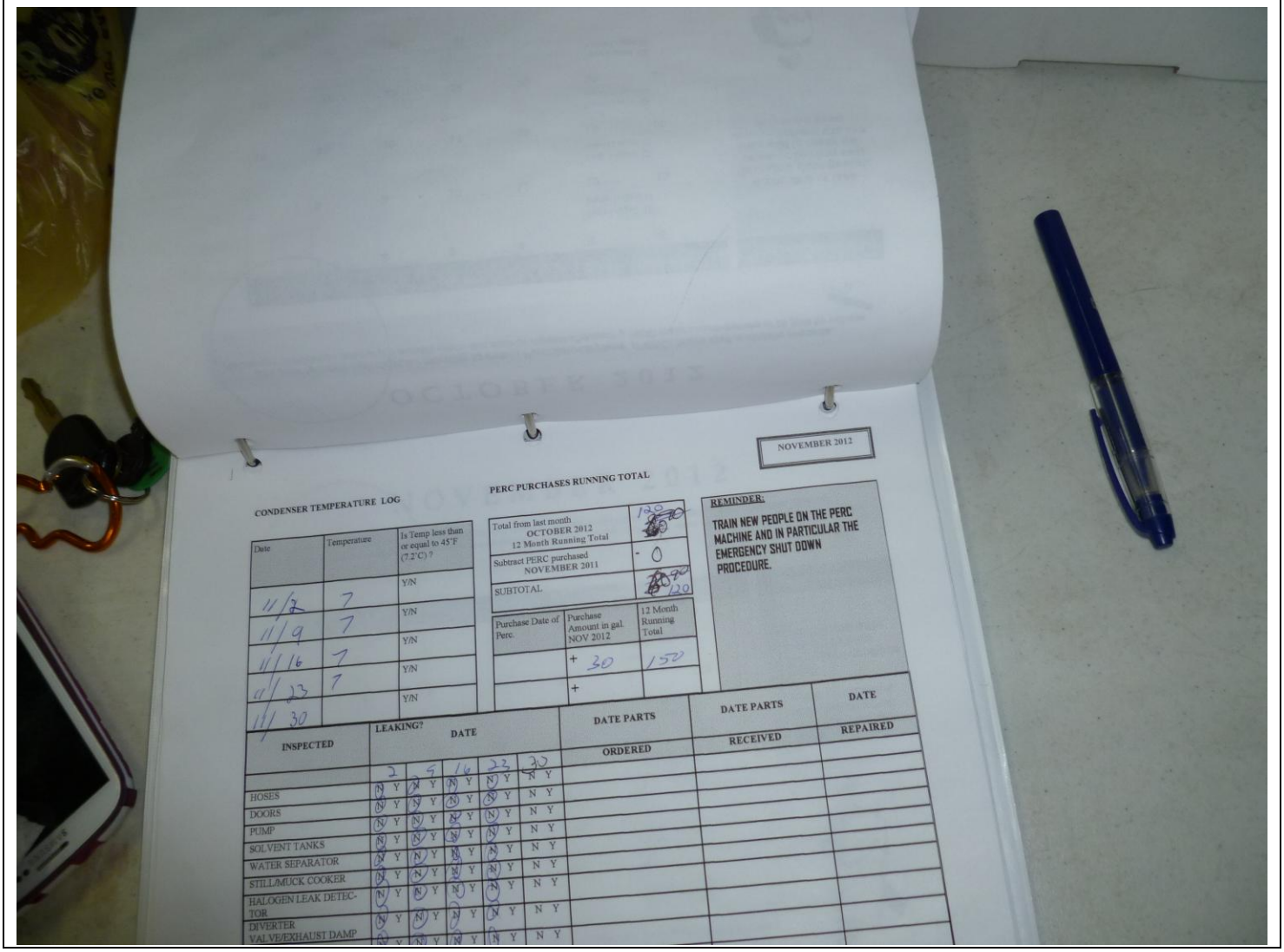
Inspector: Shea Jackson **Inspection Date / Time:** 12/3/2012 / _____

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]

Spartan Enterprises, Inc. Spartan Cleaners - Plant #1

32646 U.S. Highway 19 North, Palm Harbor



Project Id: 84685 **Permit No:** 1030296-003-AG **Arms Number:** 0296

Inspector: Shea Jackson **Inspection Date / Time:** 12/3/2012 / _____

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: [The calendar records for Perc totals, leak and temperature checks]