



# PERCHLOROETHYLENE DRY CLEANERS



## COMPLIANCE INSPECTION CHECKLIST

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

**AIRS ID#:** 0150059 **DATE:** 01-10-2013 **ARRIVE:** 2:20 p.m. **DEPART:** 4:00 p.m.

**FACILITY NAME:** LAFRANCE CLEANERS

**FACILITY LOCATION:** 4435 TAMIAMI TRAIL  
 PORT CHARLOTTE 33980-2123

**OWNER/AUTHORIZED REPRESENTATIVE:** SCOTT GOULD **PHONE:** (941)627-6969  
**Email:** LaFranceDryCleaners@yahoo.com **Mobile:**  
**CONTACT NAME:** John Algar **PHONE:** (941)219-2501  
**Email:** LaFranceDryCleaners@yahoo.com **Mobile:**  
**ENTITLEMENT PERIOD:** 4/30/2011 / 4/30/2016  
 (effective date) (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,  $140 \leq x \leq 2,100$  gal/yr  
 transfer only,  $200 \leq x \leq 1,800$  gal/yr  
 both types,  $140 \leq x \leq 1,800$  gal/yr  
 (constructed before 12/9/91)

**4. New large area source**   
 dry-to-dry only,  $140 \leq x \leq 2,100$  gal/yr  
 transfer only,  $200 \leq x \leq 1,800$  gal/yr  
 both types,  $140 \leq x \leq 1,800$  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 289.50 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 drained 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 facility 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 facility 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° 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 exhaust 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: RECORDKEEPING REQUIREMENTS – 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 totals 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 -----	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	g) Muck cookers -----	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
b) Door gaskets and seating -----	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	h) Stills -----	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
c) Filter gaskets and seating -----	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	i) Exhaust dampers -----	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
d) Pumps -----	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	j) Diverter valves -----	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
e) Solvent tanks and containers --	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	k) Cartridge filter housings	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
f) Water separators -----	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> 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 -----	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	g) Muck cookers -----	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
b) Door gaskets and seating -----	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	h) Stills -----	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
c) Filter gaskets and seating -----	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	i) Exhaust dampers -----	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
d) Pumps -----	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	j) Diverter valves -----	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
e) Solvent tanks and containers --	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	k) Cartridge filter housings	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
f) Water separators -----	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> 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 :

Laura M. Comer and Robert Stewart

01-10-13

\_\_\_\_\_  
Inspector's Name (Please Print)

\_\_\_\_\_  
Date of Inspection

\_\_\_\_\_  
Inspector's Signature

\_\_\_\_\_  
Approximate Date of Next Inspection

**COMMENTS:** A site inspection was conducted by Laura Comer on 1/7/2013. At that time purchase receipts and the compliance calendar were not available for inspection and the plant manager was unavailable. Bob Stewart and Laura Comer met with the plant manager on-site 1/10/2013 to complete the inspection and review the paperwork.

Part III. 1) On 1/7<sup>th</sup> two drums of perc containing sludge were observed to be closed but not tightly sealed. This was corrected and the drums noted to be tightly sealed on 1/10<sup>th</sup>.

Part III.2) Separator water discharges from the dc machine via a tube into a one gallon container. On 1/7<sup>th</sup> this container was noted to be overflowing into the dc machine secondary containment. This was corrected prior to the 1/10<sup>th</sup> site visit.

Part V.2) The owner is keeping rolling monthly totals but the purchases reflected on the calendar were not consistent with the purchase receipts and did not include the purchase dates. A corrected 12 month rolling total was entered in the January 2013 calendar and the recordkeeping requirement was reviewed with Mr. Algar.

Part V.3.a) Mr. Algar demonstrated the use of the hydrocarbon detector during the 1/10<sup>th</sup> inspection. A leak was detected around the air filter gasket assembly. During the site visit, Mr. Algar opened the assembly and cleaned the gasket and confirmed that no leak remained. He indicated this has happened before. Detection of leaks and the associated corrective actions should be noted on the calendar.

During the 1/7<sup>th</sup> inspection, a hose was observed bringing water into the dc machine and another discharging to the sewer clean out connection. Mr. Gould indicated the water was cooling the dc machine but deferred to Mr. Algar for further explanation. The compliance calendar was not available at that time to look for further explanation. On 1/10<sup>th</sup> Mr. Algar indicated that the cooling system for the refrigerated condenser has not functioned since October 2012. The RC is operating but non-contact tap water is being passed through (discharging to sewer) to cool the refrigeration unit. The water is turned on when the machine is running. The cool down cycle was observed during the inspection, the RC noted to come on, and the gauge indicated the exhaust temperature was in the low 30s at the end of the cycle. Mr. Algar acknowledged that this process uses a lot of water and has resulted in a significant increase in water and sewer charges. He indicated this is a temporary solution until the facility can afford to replace the RC (~\$9,000).

Part V.7) The facility is required to operate and maintain equipment in accordance with the procedures noted in the startup, shutdown, malfunction plan. (The operation manual may serve as the startup/shutdown/malfunction plan). If any action is taken which is inconsistent with standard operating procedure, the owner or operator shall record and report the actions taken to the Department during facility inspections. The facility reported the deviation in the cooling equipment during the inspection. This deviation needs to also be recorded in facility documentation (a notation on the compliance calendar or description of the problem). The facility has implemented an alternative procedure which appears to be sufficiently cooling the exhaust temperature. Does the facility have a plan or schedule for returning the unit to operation according to the manufacturer's recommendations?