

## PERCHLOROETHYLENE DRY CLEANERS



## COMPLIANCE INSPECTION CHECKLIST

| INSPECTION TYPE: ANNUAL (INS1, INS2)  COMPLAINT/DISCOVERY (CI)   |  |  |  |  |
|--|--|--|--|--|
| RE-INSPECTION (FUI) ARMS COMPLAINT NO:   |  |  |  |  |
|  |  |  |  |  |
| AIRS ID#: 0710141 DATE: <u>12/06/2007</u> ARRIVE: <u>12:00P.M.</u> DEPART: <u>1:00 P.M.</u>  |  |  |  |  |
| FACILITY NAME: EDISON DRY CLEANERS   |  |  |  |  |
| FACILITY LOCATION: 2215 G Winkler Ave  |  |  |  |  |
| FT MYERS 33901   |  |  |  |  |
| OWNER/AUTHORIZED REPRESENTATIVE: Kleber Olivero PHONE: (239)   |  |  |  |  |
| CONTACT NAME: PHONE:   |  |  |  |  |
| ENTITLEMENT PERIOD: / (effective date) (end date)  |  |  |  |  |
|  |  |  |  |  |
| PART I: <u>INSPECTION COMPLIANCE STATUS</u> (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, $140 \le x \le 2,100$ gal/yr transfer only, $200 \le x \le 1,800$ gal/yr both types, $140 \le x \le 1,800$ gal/yr (constructed before $12/9/91$ )  4. New large area source dry-to-dry only, $140 \le x \le 2,100$ gal/yr transfer only, $200 \le x \le 1,800$ gal/yr both types, $140 \le x \le 1,800$ gal/yr (constructed on or after $12/9/91$ ) |  |  |  |  |
| 5. Ineligible for General Permit drop store/out of business/petroleum facility exceeds above limits  |  |  |  |  |
| <b>B</b> . The total quantity of perchloroethylene (perc) purchased within the preceding 12 months by this dry cleaning facility was 15 gallons.   |  |  |  |  |

| PA        | PART III: GENERAL CONTROL REQUIREMENTS – Rule 62-213.300 FAC (check ☑ only one box   |  |  |  |  |
|-----------|--|--|--|--|--|
| Do        | Does the responsible official of the dry cleaning facility:  for each question)  |  |  |  |  |
| 1.        | Store perc, and wastes containing perc, in tightly sealed & impervious containers?   | □Yes □No □N/A                            |  |  |  |
| 2.        | Examine the containers for leakage?  | ☐Yes ☐ No ☑ N/A                          |  |  |  |
| 3.        | Close and secure machine doors except during loading/unloading?  | ⊠ Yes □ No                               |  |  |  |
|           | Drain cartridge filters in their housing or in sealed containers for at least 24 hours prior to disposal?  | ⊠Yes □ No □ N/A                          |  |  |  |
| 5.        | Maintain solvent-to-carbon ratios and steam pressure for carbon adsorber beds 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.14. Classification: page <u>1</u> of <u>4</u> , this form)  |  |  |  |  |
|           | 1. If the facility classification is a <b>Existing small area source</b> , no controls are requi   | ired. 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. <b>Complete section A. below.</b>  |  |  |  |  |
|           | 3. If the facility classification is a <b>Existing large area source</b> , the machine should be equipped with either a refrigerated condenser or a carbon adsorber. <b>Complete both sections A and B below.</b> 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.  |  |  |  |  |
| <b>A.</b> | Has the responsible official of all <u>existing large</u> <u>area</u> & <u>new sources</u> :   | (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                               |  |  |  |
| 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) |  |  |  |  |
|--|--|--|--|--|
| В.   | Does the responsible official of an existing large or new large area source also:  | (check ☑ only one box for each question) |  |  |
| 1.   | Measure and record the exhaust temperature on the outlet side of the condenser located on dry-to-dry, reclaimer, and dryer machines on a weekly basis?   | □Yes □No                                 |  |  |
| 2.   | Measure and record the washer exhaust temperature at the condenser inlet and outlet weekly?  | - Yes No No                              |  |  |
|  | a) Is the temperature differential equal to, or greater than $20^{\rm o}{\rm F?}$  | ☐Yes ☐ No ☐ N/A                          |  |  |
| 3.   | Measure and record the perc concentration in the exhaust stream 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.   | Assure 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 duct diameters upstream from any bend, contraction, or expansion; and downstream from no other inlet? | □Yes □ No □ N/A                          |  |  |
| 5.   | Equip transfer machines (dryers, reclaimers, and washers) with individual condenser coils?   | - Yes No No                              |  |  |
| 6.   | Route airflow to the carbon adsorber (if used) at all times?   | ☐Yes ☐ No ☐ N/A                          |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
| PART V: RECORDKEEPING REQUIREMENTS – Rule 62-213.300(3) FAC      |  |  |  |  |
| Do   | pes the responsible official:  | (check ✓ only one box for each question) |  |  |
| 1.   | Maintain receipts for perc purchased?  | Yes No                                   |  |  |
|  | Maintain rolling monthly total of yearly perc consumption?   | ⊠ Yes □ No                               |  |  |
| 3.   | Maintain leak detection inspection and repair reports for the following:   |  |  |  |
|  | a) documentation of leaks repaired w/in 24 hrs? or;  | Yes No No N/A                            |  |  |
|  | b) documentation of 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.   | Maintain calibration data? (for applicable direct reading instruments)   | ☐ Yes ☐ No ☒ N/A                         |  |  |
| 5.   | Maintain exhaust duct monitoring data on perc concentrations?  | ☐ Yes ☐ No ☒ N/A                         |  |  |
| 6.   | Maintain a startup/shutdown/malfunction plan?  | ⊠ Yes □ No                               |  |  |
| 7.   | Maintain deviation reports?  | Yes No No N/A                            |  |  |
|  | a) Problem corrected?  | Yes No No N/A                            |  |  |
| 8.   | Maintain a compliance plan, if applicable?   | Yes No No N/A                            |  |  |
|  |  |  |  |  |

## PART VI: <u>LEAK DETECTION AND REPAIRS</u> – Rule 62-213.300 FAC

1. Does the responsible official conduct a weekly (for small sources, bi-weekly) leak

(check ☑ only one box for each question)

| detection and repair inspection?   |                                     |  |  |  |
|--|-------------------------------------|--|--|--|
| 2. Does the facility maintain a leak log?                                  |                                     |  |  |  |
| c) Filter gaskets and seating  | Iuck cookers                        |  |  |  |
| 4. Which method(s) of detection (is/are) used by the responsible official? |                                     |  |  |  |
| a) Visual examination (condensed solvent on exterior surfaces)             |                                     |  |  |  |
| ROBERT J. STEWART  | 12/06/2007                          |  |  |  |
| Inspector's Name (Please Print)  | Date of Inspection                  |  |  |  |
|  | 01/2008                             |  |  |  |
| Folsell J. Stewart   |                                     |  |  |  |
| Inspector's Signature  | Approximate Date of Next Inspection |  |  |  |

**COMMENTS:** Facility is under new ownership and must submit a new Air General Permit for its operation. During the joint inspection with Hazardous Waste personnel, very strong PERC odors were noted in the front lobby of the facility while the dry cleaning machine was in operation. A check inside of the clothes in the drum after the unit had completed its cycle, noted very strong PERC odors emanating from the clothes. The new owner, Kleber Olivero, stated that a new blower unit on the back of the machine had recently been installed, but that he had no indication from the repairman that there may be anything wrong with the machine. The Malfunction part of the facility's S/S/M Plan needs to be expanded upon and a narrative describing procedures for handling an actual spill at the facility needs to be generated and posted where all workers can read and follow. A example for the malfunction part of the S/S/M Plan was posted on the machine but the example was not specific for the facility itself, just an example of how to possibly address a spill at a dry cleaning facility.