



# PERCHLOROETHYLENE DRY CLEANERS



## COMPLIANCE INSPECTION CHECKLIST

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

**AIRS ID#:** 0530051 **DATE:** 10/20/2010 **ARRIVE:** 1359 **DEPART:** 1313  
**FACILITY NAME:** IMPERIAL DRY CLEANERS  
**FACILITY LOCATION:** 5081 COMMERCIAL WAY  
 SPRING HILL 34606-1930  
**OWNER/AUTHORIZED REPRESENTATIVE:** PAUL YETTAW **PHONE:** (352)596-4644  
**Email:** **Mobile:**  
**CONTACT NAME:** Helen Yettaw/Paul Yettaw **PHONE:** (352)596-4644  
**Email:** **Mobile:**  
**ENTITLEMENT PERIOD:** 6/23/2008 / 6/23/2013  
 (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 ? 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 type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	g) Muck cookers ----- <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
b) Door gaskets and seating ----- <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	h) Stills ----- <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
c) Filter gaskets and seating ----- <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	i) Exhaust dampers ----- <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
d) Pumps ----- <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	j) Diverter valves ----- <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
e) Solvent tanks and containers -- <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	k) Cartridge filter housings <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
f) Water separators ----- <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" 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 type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	g) Muck cookers ----- <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
b) Door gaskets and seating ----- <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	h) Stills ----- <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
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d) Pumps ----- <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	j) Diverter valves ----- <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
e) Solvent tanks and containers -- <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	k) Cartridge filter housings <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
f) Water separators ----- <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" 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 : No evidence of leak detection maintained for January 2010 through October 20, 2010

Joseph V. Panetta

10/20/2010

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

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

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

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

**COMMENTS:** Visited facility and introduced myself to the woman working at the service counter. She said she couldn't help me but would call Paul Yettaw. Paul did not answer his phone so she called Helen Yettaw. Mrs. Helen Yettaw tried to help by finding the logs used to document maintenance, rolling 12 month average and other required documentation. After Paul Yettaw arrived 1451 and it was determined that :

Helden, Inc. failed to conduct bi-weekly leak detection inspections of the facility and enter the results of the inspection into the inspection and repair log kept on-site as required per Rule 62-213.900(6)(a)2, Perchloroethylene Dry Cleaners Air General Permit Registration Form Part II.

Helden, Inc. failed to maintain a record of the total amount of perchloroethylene purchased in the period from January 1 through October 201, 2010 and calculate the total amount purchased in the preceding twelve months, as a measure of the rolling 12 month average of perchloroethylene consumption as required per Rule 62-213.900(6)(b), Perchloroethylene Dry Cleaners Air General Permit Registration Form Part II.

At this time it was also determined that Mr. Yettaw stated he had switched to a petroleum based liquid called Fabrisolv about 6 weeks ago (that would be approximately September 8, 2010). Mr Yettaw was not able to produce receipts for the Fabrisolv. There was a sticker on the machine stating that this Machine contains "Fabrisolv". The distributor of Fabrisolve is PolySystems USA (Fabrisolv.com), Bayonne N.J 1-800-696-9520.

Referred to enforcement