PERCHLOROETHYLENE DRY CLEANERS

COMPLIANCE INSPECTION CHECKLIST

Environmental Compliance

INSPECTION TYPE: ANNUAL (INS1, INS2) ☒ COMPLAINT/DISCOVERY (CI) ☐

RE-INSPECTION (FUI) ☐ ARMS COMPLAINT NO:

AIRS ID#: 0950305 **DATE:** 1/10/2013 **ARRIVE:** 10:50 AM **DEPART:** 11:30 AM

FACILITY NAME: SUPERIOR CLEANERS

FACILITY LOCATION: 2131 Americana Blvd

ORLANDO 32839-2174

OWNER/AUTHORIZED REPRESENTATIVE: ABDUL KASU **PHONE:** (407)928-8081
Email: **Mobile:**
CONTACT NAME: Sayeeda Kasu **PHONE:**
Email: **Mobile:**
ENTITLEMENT PERIOD: 12/9/2006 (effective date) / 12/9/2011 (end date) **Facility may be operating without Entitlement!**

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 ≤ 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)

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 d rained 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 f acility 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 fa cility 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^{o} 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 exhaus t 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^{o} 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: <u>RECORDKEEPING REQUIREMENTS</u> – 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 total s 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 ----------	☐ Yes	☒ No	☐ N/A	g)	Muck cookers --------	☐ Yes	☒ No	☐ N/A
b) Door gaskets and seating ------	☐ Yes	☒ No	☐ N/A	h)	Stills ----------	☐ Yes	☒ No	☐ N/A
c) Filter gaskets and seating ------	☐ Yes	☒ No	☐ N/A	i)	Exhaust dampers -----	☐ Yes	☒ No	☐ N/A
d) Pumps ----------	☐ Yes	☒ No	☐ N/A	j)	Diverter valves ---------	☐ Yes	☒ No	☐ N/A
e) Solvent tanks and containers --	☐ Yes	☒ No	☐ N/A	k)	Cartridge filter housings	☐ Yes	☒ No	☐ N/A
f) Water separators ----------	☐ Yes	☒ No	☐ 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 ----------	☐ Yes	☒ No	☐ N/A	g)	Muck cookers --------	☐ Yes	☒ No	☐ N/A
b) Door gaskets and seating ------	☐ Yes	☒ No	☐ N/A	h)	Stills ----------	☐ Yes	☒ No	☐ N/A
c) Filter gaskets and seating ------	☐ Yes	☒ No	☐ N/A	i)	Exhaust dampers -----	☐ Yes	☒ No	☐ N/A
d) Pumps ----------	☐ Yes	☒ No	☐ N/A	j)	Diverter valves ---------	☐ Yes	☒ No	☐ N/A
e) Solvent tanks and containers --	☐ Yes	☒ No	☐ N/A	k)	Cartridge filter housings	☐ Yes	☒ No	☐ N/A
f) Water separators ----------	☐ Yes	☒ No	☐ 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 leak checks conducted or logged.

Ilka Bundy	1/10/2013
Inspector's Name (Please Print)	Date of Inspection
	4/10/2013
Inspector's Signature	Approximate Date of Next Inspection

COMMENTS: Inspectors Ilka Bundy and Lawrence Ross conducted an inspection for the air general permit and hazardous waste management. This facility's air general permit expired 12/9/2011. According to the facility manager, Shak Wahab, the R.O., Abdul Kasu, died approximately 3 years ago. His wife, Sayeeda Kasu, has taken over the business, but went to North Carolina and will not be back until sometime in March. No record-keeping has been conducted since the last inspection on 2/28/2011. No perc receipts were available. No halogen leak detector is on site. The back of the perc dry cleaning machine was leaking perc out of a recovery tank. It appeared that the workers tried to cover up the paint stripping done by the perc leak by painting the area with a silver spray paint and a plastic bag taped around the area. Pictures were taken by Lawrence Ross to document the leak. The store manager, Shak, gave the inspectors a phone number for a person who handles the facility's responsibilities when Sayeeda Kasu is out of town. The inspector, Ilka Bundy, called Scott MacGregor (407-579-6333, or 407-380-9090) on 1/11/2013 to discuss some of the issues related to the air permit. Scott requested that a fax needs to be sent to him at 888-664-5392 with the issues that need to be addressed. A fax was sent at 3:05 PM on the same day with 4 major issues that needed to be addressed immediately. Scott contacted a consulting company, Waste Direct Consulting, Inc. Anne Hopkins from the consulting company called Ilka Bundy and stated she would be handling the issues requested. As of 1/14/2013, the facility registered for the air general permit using the electronic registration process, AGPERS. The facility will be re-inspected by Ilka Bundy around April 10, 2013.